Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

64459

Ana Gloria Ramos, P.E.
Designated Coordinator

March 10, 1992

Eng. Caroline Kwan
Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
US Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

RE: Tutu Well Site
Administrative Order on Consent
Index No. II-RCRA-Proceeding
7003 and 9003-92-0401
Monthly Progress Report No. 1

Dear Mrs. Kwan:

Attached find the Written Monthly Progress Report for the subject Administrative Order.

If you have any question regarding this matter, please contact the undersigned at (809) 749-8943.

Very truly yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

AGR/mpt/EPAKWAN

Attachments

pc: Mr. J. L. Blanco
Mr. D. Lee
Scott McCay, Esq. - Texaco
Mr. L. Ruiz - Texaco
José A. Cepeda/Francis Torres, Esqs.
Mr. José Font - EPA Caribbean Field Office
Mr. Roy E. Adams - Commissioner DPNR-USVI
Mr. Leonard Reed - DPNR-USVI

TUT 003 1372

Telephone: (809) 792-2920 Fax. (809) 793-6555

MONTHLY PROGRESS REPORT NO. 1
MARCH 10, 1992

RE: Tutu Well Site
Administrative Order on Consent
Index No. II - RCRA - Proceeding
7003 & 9003-92-0401

I. Work to Date

1. Designation of the Tutu Environmental Investigation Committee Designated Coordinator - March 3, 1992. Copy of letter attached.

2. Site Access Authorization - On March 5 & 6, 1992 all owners of properties in the Tutu Area where field investigations will be conducted pursuant to the Work Plan were provided with request for site access.

3. Preliminary reconnaissance activities by Geraghty & Miller were initiated in December 1991. This work included:

   -Compilation of existing geologic and hydrogeologic data.

   -Analysis of aerial photographs to identify faults and fracture traces.

   -An inventory of existing wells in the area.

   -Compilation of underground piping which may affect drilling access and hydrocarbon fuel migration.

4. From December 16 thru 21, 1991, Geraghty & Miller performed on-site fieldwork which consisted of a magenotometer survey and site reconnaissance. Prior to mobilization, this fieldwork was coordinated with the United States Environmental Protection Agency (USEPA) and the US Virgin Islands Department of Planning and Natural Resources (DPNR). DPNR personnel were present during the fieldwork.

5. During this site visit, Geraghty & Miller personnel also marked preliminary drilling locations.

II. Work to Be Done

1. Obtain Site Access Agreements properly signed by owners.

2. On April 2, 1992 investigatorial program will be initiated.

3. Submit copy of Order to Subcontractors, Laboratories and Consultants retained for work by March 24. 1992.

4. Initiate performance of Investigatorial Program (i.e., Start Work Plan Schedule) by April 2, 1991. In accordance with the Work Plan Schedule, Technical Memorandum #1 regarding fracture trace analysis and well locations will be submitted to USEPA no later than six weeks after initiation of the work plan (i.e., no later than May 21, 1992).

5. Geraghty & Miller will be submitting revised copies of the Work Plan and Quality Assurance Project plan (QAPP) to the USEPA by March 23, 1992. These revisions will include the finalized analytical parameters set forth in the Order.

AGR/mpt/EPAKWAN

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

April 9, 1992

Eng. Caroline Kwan
Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
US Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

RE: Tutu Well Site
Administrative Order on Consent
Index No. II-RCRA-Proceeding
7003 and 9003-92-0401
Monthly Progress Report No. 2

Dear Mrs. Kwan:

Attached find the Written Monthly Progress Report for the subject Administrative Order.

If you have any question regarding this matter, please contact the undersigned at (809) 749-8943.

Very truly yours,

Ana Gloria Ramos, P.E.
Designated Coordinator

AGR/mpt/EPAKWAN

Attachments

pc: Mr. J. L. Blanco
Mr. D. Lee
Scott McCay, Esq. - Texaco
Mr. L. Ruiz - Texaco
José A. Cepeda/Francis Torres, Esqs.
Mr. José Font - EPA Caribbean Field Office
Mr. Roy E. Adams - Commissioner DPNR-USVI
Mr. Leonard Reed - DPNR-USVI

TUT 003 1375

MONTHLY PROGRESS REPORT NO. 2
APRIL 9, 1992

RE: Administrative Order on Consent
Index No. II - RCRA - Proceeding
7003 & 9003-92-0401

This status report includes the work performed during the period March 11 through March 31, 1991. Subsequent Monthly Status Reports will cover the first day through the last day of each month.

WORK COMPLETED DURING PREVIOUS MONTH

1. Submittal of the revised Work Plan and Quality Assurance Project Plan (QAPP) to the USEPA on March 23, 1992. The revisions included the analytical parameters set forth in the Order.

2. Compilation and review of the National Priority List (NPL) reference material for the Tutu wellfield.

3. Preliminary preparation of Technical Memorandum #1.

4. Preparation of a site-specific base map of the Tutu study area.

5. Submittal of request for temporary authorization of groundwater discharge to the sanitary sewer to Commissioner Leo Francis, Department of Public Works on March 11, 1992.

6. Submittal of request for temporary authorization of air discharge via water treatment air stripper to Todd Shank, Department of Planning and Natural Resources on March 10, 1992.

7. Requested water treatment system price quotations from suppliers.

8. Eleven out of fifteen site access obtained (including Esso & Texaco) copy attached.

WORK TO BE COMPLETED DURING NEXT MONTH

The work to be completed by April 30, 1992 is summarized below:

1. Final preparation and submittal of Technical Memorandum #1 on April 13, 1992 to the USEPA.

2. Preparation for Tutu public meeting, tentatively scheduled for May 14 or 15, 1992.

3. Arrange for purchase of water treatment system.

4. Contact Commissioner Leo Francis, Department of Public Works, regarding status of temporary authorization of ground-water discharge to the sanitary sewer.

5. Contact Department of Planning and Natural Resources regarding status of temporary authorization of air discharge via water treatment system air stripper.

6. Preliminary arrangements for mobilization of field equipment.

7. Preliminary arrangements for downhole geophysical equipment rental.

8. Obtained four site access that are still pending (Four Winds Plaza, Splash & Dash, Gasset Auto Parts, O'Henri, Inc.)

ANA GLORIA RAMOS
Designated Coordinator

EPAKWAN

AGR/mpt/EPAKWAN

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

June 10, 1992

Eng. Caroline Kwan
Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
US Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

RE: Tutu Well Site
Administrative Order on Consent
Index No. II-RCRA-Proceeding
7003 and 9003-92-0401
Monthly Progress Report No. 4

Dear Mrs. Kwan:

Attached find the Written Monthly Progress Report for the subject Administrative Order.

If you have any question regarding this matter, please contact the undersigned at (809) 749-8943.

Very truly yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

AGR/mpt/EPAKWAN

Attachments

pc: Mr. J. Juanet
Mr. D. Lee
Scott McCay, Esq. - Texaco
Mr. L. Ruiz - Texaco
José A. Cepeda/Francis Torres, Esqs.
Mr. José Font - EPA Caribbean Field Office
Mr. Roy E. Adams - Commissioner DPNR-USVI
Mr. Leonard Reed/ Benjamin Nazario - DPNR-USVI

TUT 003 1378

Telephone: (809) 792-2920 Fax. (809) 793-6555

MONTHLY PROGRESS REPORT NO. 4
June 10, 1992

RE: Administrative Order on Consent
Index No. II - RCRA - Proceeding
7003 & 9003-92-0401

WORK COMPLETED DURING THE MONTH

This progress report presents a summary of work completed during the monthly period ending May 31,1992.

1. A meeting by Geraghty & Miller, Inc. USEPA, Soil Tech, CDM-Federal Programs (CDM) and Tutu Environmental Investigation Committee (TEIC) representatives was held at USEPA-Region II headquarters on May 5, 1992. The purpose of the meeting was to discuss final drilling locations and CDM's comments on Technical Memorandum I.

2. An organizational meeting was held by Geraghty & Miller, Soil Tech, Enseco East, and TEIC on May 6, 1992.

3. Geraghty & Miller prepared a detailed schedule of drilling activities for submittal to USEPA and CDM.

4. Geraghty & Miller provided a summary of the proposed investigation and an outline of milestone for CDM and USEPA to be used in the fact sheet for community relations meeting.

5. Geraghty & Miller coordinated use of water from the Water and Power Authority (WAPA) supply line at the Virgin Islands Housing Authority (VIHA) maintenance office in Tutu, VHA will be reimbursed for the water. A sample of this water supply was collected during the fifth sampling event in February 1992. The analytical results indicated that this water is suitable for use during drilling and steam cleaning.

6. Soil Tech received well permits from the US Virgin Islands Department of planning and Natural Resources dated May 11, 1992.
The earth change permit is expected to be approved in early June.

7. Resumes for new project personnel are enclosed. Wanda I. Morales of Geraghty & Miller, Inc. will be performing drilling Supervision and downhole geophysics. Dan Bingham and Ken Kanizar of Bingham Enviromental, Inc. will be the field gas chromatogram operators.

WORK TO BE COMPLETED DURING JUNE 1992

1. The mobilization for the field investigation will be completed. Drilling is expected to begin Tuesday, June 2, 1992. A Health and Safety Meeting will be conducted onsite on June 2, 1992.

2. It is anticipated that approximately six (6) deep monitoring wells will be completed by the end of June 1992. The drilling program is expected to continue through mid-August 1992.

3. The first drilling locations will be MW-4D at Texaco and MW-1D at the Curriculum Center. These locations were chosen first because legal access was approved and these locations are close to the water supply (WAPA water line at VHA) and the steam cleaning area at Texaco.

4. Other drilling locations planned for June are MW-6D and MW-10D at Four winds Plaza, MW-13D at VIHA, MW-12D at the Grace Gospel Church and MW-11D at the Lutheran Reformed Church. Legal access for the Four Winds Plaza is still undergoing discussion and negotiation. The schedule of borings may have to be revised if legal access is not obtained by mid-June.

5. Access for Gasset Auto Parts and O'Henrys is still undergoing Negotiations.

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

July 10, 1992

Eng. Caroline Kwan
Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
US Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

RE: Tutu Well Site
Administrative Order on Consent
Index No. II-RCRA-Proceeding
7003 and 9003-92-0401
Monthly Progress Report No. 5

Dear Mrs. Kwan:

Attached find the Written Monthly Progress Report for the subject Administrative Order.

If you have any question regarding this matter, please contact the undersigned at (809) 749-8943.

Very truly yours,

Ana Gloria Ramos/Dpt

Ana Gloria Ramos, P.E.
Designated Coordinator

AGR/mpt/EPAKWAN

Attachments

pc: Mr. J. Juanet
Mr. D. Lee
Scott McCay, Esq. - Texaco
Mr. L. Ruiz - Texaco
José A. Cepeda/Francis Torres, Esqs.
Mr. José Font - EPA Caribbean Field Office
Mr. Roy E. Adams - Commissioner DPNR-USVI
Mr. Leonard Reed/ Benjamin Nazario - DPNR-U[illegible]

TUT 003 1381

Telephone: (809) 792-2920 Fax. (809) 793-6555

MONTHLY PROGRESS REPORT NO. 5
July 10, 1992

RE: Administrative Order on Consent
Index No. II - RCRA - Proceeding
7003 & 9003-92-0401

WORK COMPLETED DURING THE MONTH

1. Drilling fieldwork began in June with steam cleaning and set-up of equipment on June 3rd and 4th. As of June 30, 1992 four monitoring wells have been completed, including MW-1, MW-3, MW-4, and MW-4D. Soil boring B-4 has also been drilled and sampled. As of June 30, 1992, three drilling locations were partially completed (i.e., soil sampling complete; coring and reaming in progress) including MW-1D, MW-11D and MW-13D.

2. The temporary treatment system for the pumping test has been delivered to the site. Installation of the temporary treatment system has begun.

3. Downhole geophysical logging using sonic and caliper tools was performed in the corehole at MW-4D.

4. A site access agreement with Four Winds Plaza Associates is still under negotiation.

5. Soil samples from the soil borings have been analyzed using the field gas chromatograph. Based upon photo ionization detector (i.e., HNU) results, soil samples have been collected and shipped for laboratory analysis in accordance with the work plan.

6. Site access for O' Henry Site was obtained (copy attached).

Note: Copy of Progress Report meeting conducted at the site are attached for reference only.

WORK TO BE COMPLETED DURING NEXT MONTH

The work to be completed by July 30, 1992 is summarized below:

1. Continued drilling activities at MW-1D, MW-5, MW-7, MW-8, MW-11D, MW-12D, MW-13D, and MW-14.

2. If site access is granted by Four Winds Plaza Associates, drilling may be performed at MW-2, MW-6, MW-6D, MW-9, MW-10 or MW-10D.

Ana Gloria Ramos

ANA GLORIA RAMOS

LICENSE AGREEMENT FOR ACCESS

THIS AGREEMENT is made this ___ day of _____, 1992, between **CYRIL V. FRANCOIS ASSOCIATES**, a U.S. Virgin Islands General Partnership, and **L'HENRI, INC.**, a U.S. Virgin islands Corporation (hereinafter the "**Licensors**"), and the **TUTU ENVIRONMENTAL INVESTIGATION COMMITTEE** (hereinafter "**TEIC**"), a non-incorporated entity formed and funded by **TEXACO CARIBBEAN, INC.**, and **ESSO STANDARD OIL, S.A.** (collectively hereinafter the "**Licensees and TEIC**").

The **Licensors** are the owner of a parcel of land in the United States, Virgin Islands at the address:

Parcel No. 5B Estate Annas Retreat
St. Thomas, U.S. Virgin Islands

("the **Premises**"). The **Premises** is being leased by **L'Henri, Inc.**, a corporation organized under the laws of the Virgin Islands. **Licensors** have agreed to allow **Licensees** to enter on the **Premises** for the purposes of conducting soil sampling and related site reconnaissance ("Permitted Activities") under the terms and conditions of this Agreement. The **Licensors** are willing to permit such limited entry solely to accommodate the request made by the **TEIC** to obtain samples from the **Premises** to satisfy the requirements of the Remedial Investigation/Feasibility Study ("RI/FS") being conducted for the site. The **Licensees** are willing to conduct their entry, site reconnaissance and sampling subject to the terms and conditions contained herein.

THEREFORE, for the purpose set forth above and in

1.3 The closure of all wells drilled in the LOCATION will be done in a sound manner at the end of the investigation, following accepted principles of engineering. All activity on the property, including the closure of any wells drilled, will be conducted in accordance with all applicable laws.

1.4 If sound recording or photographic equipment is used, copies of recording or photographs produced must be provided to **Licensors** at the address stated below.

1.5 **Licensees**, their employees, agents, contractors and subcontractors shall conduct the Permitted Activities hereunder in a manner that, to the extent reasonably practicable, will not interfere with the use and occupancy of the **Premises** by **Licensors** or its tenant, **L'Henri, Inc.**

1.6 All activities will be conducted at reasonable times and in a reasonable manner so as to ensure that the activities do not represent any environmental, safety, or health risk and do not interfere with the operations at the **Premises**. In the event of any interference which causes the permanent or temporary closure of the operations at the **Premises**, **TEIC** will immediately suspend such activity and seek to negotiate compensation for continued access.

1.7 **Licensees**, their employees, agents, contractors and subcontractors shall conduct the Permitted Activities hereunder in a manner that will not cause permanent damage on the **Premises**.

1.8 **Licensees**, their employees, agents, contractors and subcontractors shall conduct the Permitted Activities hereunder as expeditiously and effectively as is practicable.

consideration of the recitals and mutual promises herein contained, **Licensees** and **Licensors**, intending to be legally bound hereby, agree as follows:

1. **LICENSE**

1.1 **Licensors** shall allow **Licensees**, USEPA, the Department of Planning and Natural Resources, their employees, agents, contractors and subcontractors the right to enter upon the **Premises** to conduct Permitted Activities subject to all the terms and conditions set forth herein in accordance with the provisions set forth in an Administrative order on Consent issued by the U.S. Environmental Protection Agency (USEPA) on February, 1992, and the schedule set forth in its implementing Work Plan, copy of which is attached as Appendix A hereto. The term of this Agreement shall be as set forth in said Work Plan, but in no event shall this Agreement be effective for a term greater than six (6) months from the date of execution. This Agreement may be extended upon mutual written agreement.

1.2 **Licensees** shall have each of the **Licensors** endorsed as additional insured under **Licensees'** insurance policy or that of their contractor, Geraghty & Miller, Inc., prior to entry on the **Premises**. Said policy must provide for public liability coverage of no less than $1,000,000.00 for personal and property damage for the benefit of each insured. Copies of all applicable insurance policies or certificates of insurance shall be provided to **Licensors'** at address stated below. **Licensors** must be advised thirty (30) days in advance of cancellation of the policy.

1.9 **Licensees** shall repair any property damaged during the Permitted Activities within thirty days after the date of occurrence of such damage.

1.10 **The Licensees** will provide as expeditiously as possible and as authorized under the provisions of the administrative orders, copy of all results, raw data and reports which pertain to the activities conducted at the **Premises**.

1.11 **Licensees** agree that any information obtained by **Licensees**, their employees, agents, contractors and subcontractors as a result of the conduct of Permitted Activities hereunder shall remain confidential and shall not be disclosed to any person other than USEPA or its representative, except as may otherwise be required by law or by the Administrative Order or Consent issued by the USEPA on February, 1992.

1.12 All tasks performed must be in accordance with the work plan submitted to EPA. A copy of the portions of said plan which describe the work to be performed on the premises must be submitted to **Licensors** prior to commencement of any work.

1.13 **Licensees** shall be responsible for all costs, charges and risks associated with all work to be performed by **Licensees**.

1.14 Prior to any proposed entry by the **TEIC**, Soil Tech, DPNR, EPA, its representatives and/or its contractors upon land belonging to **Licensors**, such proposing party shall give at least fifteen (15) days written notice to the **Licensors**. Notice will be understood to be complete upon receipt which is to be confirmed delivery by fax or mail to the addressees listed herein:

As to L'Henri, Inc.:

Nancy D'Anna, Esq.
P.O. Box 37
St. John, USVI 00831
Tel. #809-776-7759
Fax. #809-779-4363

As to Cyril V. Francois Associates:

41-42 Norre Gade
P.O. Box 276
St. Thomas, U.S.V.I. 00804
Tel. #774-2370

Copy to:

David A. Bornn, Esq.
Bornn Bornn Handy & Rashid
P.O. Box 1500
St. Thomas, USVI 00804
Tel. #809-774-1400
Fax. #809-774-9607

The notice shall include, 1) the date or dates upon which such inspection is proposed, 2) a statement as to the duration of the investigation and the extent to which such inspection will require the disruption of the ordinary business conducted at the property or any part thereof.

2. **PERMITS AND APPROVALS, COMPLIANCE WITH LAWS**

2.1 The design, construction and operation of all tasks performed pursuant to the instant agreement shall be in strict compliance with all applicable laws, rules and regulations of the United States Virgin Islands and the United States. Before construction or the initiation of any operation, Licensees will be responsible for applying for, negotiating and obtaining all necessary licenses or permits required by the above-referenced laws or regulations.

2.2 All applicable permits must be obtained prior to

commencement of any work on the **Premises**.

2.3 **Licensees** agree that in connection with their exercise of any rights herein granted that they and their employees, agents, contractors and subcontractors will fully comply with all applicable federal, and local laws, rules, regulations and ordinances of any governmental authority, board or agency.

3. **NO LEASE**

3.1 This Agreement does not create, nor shall it be construed to create among the parties a landlord/tenant or any other relationship not specified herein.

4. **COMPLETE AGREEMENT**

4.1 This Agreement is the entire and only Agreement concerning use of or access to the **Premises** between the **Licensors** and **Licensees**. This Agreement is binding on the parties and their successors, assigns, employees, agents and contractors and shall benefit their respective agents, successors, assigns and tenants. No agent, employee or other representative of either party is empowered to alter or amend any of the terms of this Agreement unless such alteration and/or amendment is in writing and has been signed by an authorized representative of the party to be charged therewith. This provision cannot be waived orally.

4.2 If any provision of this License Agreement shall be unlawfully, invalid or unenforceable, that part shall be deemed deleted and without prejudice to the lawfulness, validity and enforceability of the remaining provisions of this License Agreement.

5. **INDEMNIFICATION**

5.1 **Licensees** agree to jointly and severally indemnify, defend and hold harmless **Licensors**, as to their separate and joint interests, their affiliates, partners, employees, successors, heirs, and assigns from and against any and all manner of actions, causes of actions, rights, suits, judgments, damages, claims, liabilities, or losses, including all attorney fees and costs, arising out of any act or omission of **Licensees**, their employees, agents, contractors and subcontractors undertaken or omitted in connection with their activities under this License Agreement provided that any such damages, actions, causes of actions, rights, suits, judgments, claims, liabilities, or losses, including attorney's fees are not the result of **Licensors'** acts or omissions or of their employees, agents, contractors, and subcontractors. This indemnification shall survive the term of this License Agreement as such term is set forth in paragraph 1.1 above.

IN WITNESS WHEREOF the parties have executed this Agreement on the date first indicated above through their duly authorized representatives.

WITNESSES:

Licensors:

CYRIL V. FRANCOIS ASSOCIATES

By: _____
GLORIA McGOWAN, Managing Agent

L'HENRI, INC.

_____

_____ By:_____

Licensees:
Dra Gloria Ramos
TUTU ENVIRONMENTAL INVESTIGATION COMMITTEE

TEXACO CARIBBEAN, INC.

_____

_____ By:_____

ESSO STANDARD OIL, S.A.

_____

_____ By:_____

LICENSE AGREEMENT FOR ACCESS

This Agreement is made this ____ day of _____, 1992, between Cyril V. Francois Associates and L'Henri, Inc., (hereinafter the "Licensors") and the Tutu Environmental Investigation Committee ("TEIC") a non-incorporated entity formed and funded by Texaco Caribbean, Inc., and Esso Standard Oil, S.A. (collectively hereinafter the Licensees and TEIC).

The Licensor is the owner of a parcel of land in the United States, Virgin Islands at the address,

Parcel No. 5B, Estate Annas Retreat
St. Thomas, U.S. Virgin Islands

Virgin Islands ("the premises"). The Premises is being leased by L'Henri, Inc., a corporation organized under the laws of the Virgin Islands. Licensors has agreed to allow Licensees to enter on the Premises for the purposes of conducting soil sampling and related site reconnaissance ("Permitted Activities") under the terms and conditions of this Agreement. The Licensors are willing to permit such limited entry solely to accommodate the request made by the TEIC to obtain samples from the Premises to satisfy the requirements of the Remedial Investigation/Feasibility Study ("RI/FS") being conducted for the site. The Licensees are willing to conduct their entry, site reconnaissance and sampling subject to the terms and conditions contained herein.

THEREFORE, for the purpose set forth above and in consideration of the recitals and mutual promises herein contained, Licensees and Licensors, intending to be legally bound hereby, agree as follows:

TUT 003 1392

ND

1. **LICENSE**

1.1 Licensors shall allow Licensees, USEPA, the Department of Planning and Natural Resources, their employees, agents, contractors and subcontractors the right to enter upon the Premises to conduct Permitted Activities subject to all the terms and conditions set forth herein in accordance with the provisions set forth in an Administrative order on Consent issued by the USEPA on February, 1992, and the schedule set forth in its implementing Work Plan, copy of which is attached as Appendix A hereto.

b. Licensees shall have Licensors endorsed as additional insurer under Licensees' insurance policy or that of their contractor, Geraghty & Miller, Inc., prior to entry on the Premises. Said policy must provide for liability coverage of no less that $1,000.000.00. Copies of all applicable insurance policies shall be provided to Nancy D'Anna, Esq. Licensors must be advised thirty (30) days in advance of cancellation of the policy.

c. The closure of all wells drilled in the LOCATION will be done in a sound manner at the end of the investigation, following accepted principles of engineering. All activity on the property, including the closure of any wells drilled, will be conducted in accordance with all applicable laws.

d. If sound recording or photographic equipment is used, copies of recording or photographs produced must be provided to Licensors at the Law Offices of Nancy D'Anna.

e. Licensees, their employees, agents, contractors and subcontractors shall conduct the Permitted Activities hereunder in

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a manner that, to the extent reasonably practicable, will not interfere with the use and occupancy of the premises by Licensors or its tenant, L'Henri, Inc.

f. All activities will be conducted at reasonable times and in a reasonable manner so as to ensure that the activities do not represent any environmental, safety, or health risk and do not interfere with the operations at the Licensors property. In the event of any interference which causes the permanent or temporary closure of the operations at the Licensors property, TEIC will immediately suspend such activity and seek to negotiate compensation for continued access.

g. Licensees, their employees, agents, contractors and subcontractors shall conduct the Permitted Activities hereunder in a manner that will not cause permanent damage on the premises.

h. Licensees, their employees, agents, contractors and subcontractors shall conduct the Permitted Activities hereunder as expeditiously and effectively as is practicable.

i. Licensees shall repair any property damaged during the Permitted Activities within thirty days after the date of occurrence of such damage.

j. The Licensees will provide as expeditiously as possible and as authorized under the provisions of the administrative orders, copy of all results, raw data and reports which pertain to the activities conducted at the Licensors' property.

k. Licensees agree that any information obtained by

Licensees, their employees, agents, contractors and subcontractors as a result of the conduct of Permitted Activities hereunder shall remain confidential and shall not be disclosed to any person other than USEPA or its representative, except as may otherwise be required by law or by the Administrative Order or Consent issued by the USEPA on February, 1992.

l. All tasks performed must be in accordance with the work plan submitted to EPA. A copy of the portions of said plan which describe the work to be performed on the premises must be submitted to Licensors prior to commencement of any work.

m. Licensees shall be responsible for all costs, charges and risks associated with all work to be performed by Licensees.

n. Prior to any proposed entry by the TEIC, Soil Tech, DPNR, EPA, its representatives and/or its contractors upon land belonging to Licensor, such proposing party shall give at least fifteen (15) day written notice to the Licensor. Notice will be understood to be complete upon receipt which is to be confirmed delivery by fax or mail to the addressee listed herein:

Nancy D'Anna, Esq.
P.O. Box 37
St. John, USVI 00831
Tele: 809-776-7759
FAX: 809-779-4363

The notice shall include, 1) the date or dates upon which such inspection is proposed, 2) a statement as to the duration of the investigation and the extent to which such inspection will require the disruption of the ordinary business conducted at the property

WP

or any part thereof.

2. **PERMITS AND APPROVALS, COMPLIANCE WITH LAWS**

2.1 The design, construction and operation of all tasks performed pursuant to the instant agreement shall be in strict compliance with all applicable laws, rules and regulations of the United States Virgin Islands and the United States. Before construction or the initiation of any operation, licensees will be responsible for applying, negotiating and obtaining all necessary licenses or permits required by the above-referenced laws or regulations.

2.2 All applicable permits must be obtained prior to commencement of any work on the premises.

2.3 Licensees agree that in connection with their exercise of any rights herein granted that they and their employees, agents, contractors and subcontractors will fully comply with all applicable federal, and local laws, rules, regulations and ordinances of any governmental authority, board or agency.

3. **NO LEASE**

3.1 This Agreement does not create, nor shall it be construed to create among the parties a landlord/tenant or any other relationship not specified herein.

4. **COMPLETE AGREEMENT**

4.1 This agreement is the entire and only Agreement concerning use of or access to the Premises between the Licensors and Licensees. This agreement is binding on the parties and their

successors, assigns, employees, agents and contractors and shall benefit their respective agents, successors, assigns and tenants. No agent, employee or other representative of either party is empowered to alter or amend any of the terms of this Agreement unless such alteration and/or amendment is in writing and has been signed by an authorized representative of the party to be charged therewith. This provision cannot be waived orally.

4.2 If any provision of this License Agreement shall be unlawfully, invalid or unenforceable, that part shall be deemed deleted and without prejudice to the lawfulness, validity and enforceable of the remaining provisions of this License Agreement.

5. **INDEMNIFICATION**

5.1 Licensees agrees to jointly and severally indemnify, defend and hold harmless licensor and its tenant L'Henri, Inc., their affiliates, employees, successors, heirs, and assigns from and against any and all manner of actions, causes of actions, rights, suits, judgments, damages, claims, liabilities, or losses, including attorney fees, arising out of any act or omission of Licensees, their employees, agents, contractors and subcontractors undertaken or omitted in connection with their activities under this License Agreement provided that any such damages, actions, causes of actions, rights, suits, judgments, claims, liabilities, or losses, including attorney's fees are not the result of Licensors acts or omissions or these of their employees, agents, contractors, and subcontractors. This indemnification shall survive the term of this License Agreement as such term is set

ND

forth in paragraph 1.2(a) above.

IN WITNESS WHEREOF the parties have executed this Agreement on the date first indicated above.

Licensees

By: _____
ON BEHALF OF TEIC

By: _____

Licensors

By: _____

GOLDMAN ANTONETTI FERRAIUOLI & AXTMAYER

ATTORNEYS AND COUNSELORS AT LAW

POST OFFICE BOX 70364

SAN JUAN, PUERTO RICO 00936-0364

VICENTE J. ANTONETTI
ALVARO C. CIFUENTES*
JOSE A. AXTMAYER*
JOSE A. CEPEDA-RODRIGUEZ
BLAS R. FERRAIUOLI
ROBERTO MONTALVO
LUIS F. ANTONETTI
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LEONARDO ANDRADE-LUGO
JORGE L. MARTINEZ
EUGENIO C. ROMERO
LUIS D. ORTIZ-ABREU
GREGORY T. USERA**
FRANCISCO A. BESOSA**
FRANCIS TORRES
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JORGE SEGUROLA

COUNSEL
MAX GOLDMAN*

AMERICAN INTERNATIONAL PLAZA
FOURTEENTH FLOOR
250 MUÑOZ RIVERA AVENUE
HATO REY, PUERTO RICO 00918

TELEPHONE (809) 759-8000
TELECOPIER (809) 767-9333

WRITER'S DIRECT DIAL NO.

JORGE RODRIGUEZ-MICHEO
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EDGARDO COLON-ARRARAS
JOSE M. LORIE-VELASCO
BRAULIO GARCIA-JIMENEZ
WILMER J. CAMACHO
HOWARD PRAVDA
MIGUEL J. RODRIGUEZ-MARXUACH
CARLOS E. COLON-FRANCESCHI
IVETTE GONZALEZ-BUITRAGO
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JOHN A. UPHOFF-FIGUEROA
NOEL VERA-RAMIREZ
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MARTA FIGUEROA-TORRES
YOLANDA BENITEZ DE ALEGRIA
MERCEDES M. BARRERAS-SOLER
CARLOS MARTINEZ-VIVAS

* ALSO ADMITTED IN NEW YORK
** ALSO ADMITTED IN THE DISTRICT OF COLUMBIA

June 9, 1992
Ref: 2092-001

VIA FEDERAL EXPRESS

David Bornn, Esq.
Bornn Bornn Handy & Rashid
8 Norre Gade
Kongens Quarter
Charlotte Amalia St Thomas
U.S. Virgin Island 00804

RE: Geraghty & Miller, Inc.
Cyril Francois Associates
L'Henri, Inc.

Dear Mr. Bornn:

Enclosed please find a copy of the Certificate of Insurance issued to the captioned holder covering the activities that will be performed at #5 Anna's Retreat, Tutu, St. Thomas.

License Agreement for Access will be forwarded to you once it has been signed by Ms. Ana Gloria Ramos, Designated Coordinator of the Tutu Environmental Investigation Committee.

Please call me at your earliest convenience if you have any questions regarding the enclosed certificate.

Cordially yours,

Francis Torres

FT023:nf
Enclosure
cc: Nancy D'Anna, Esq.
Ana Gloria Ramos

ACORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY) 6/02/92

PRODUCER

GALLAGHER NEWMAN
199 MAIN STREET
WHITE PLAINS, NY 10601

914-997-9200

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED

GERAGHTY & MILLER, INC.
125 E. BETHPAGE RD.
PLAINVIEW

NY 11803

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A	CENTENNIAL INS CO
COMPANY LETTER B	SEE ATTACHED
COMPANY LETTER C	
COMPANY LETTER D	
COMPANY LETTER E	

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
A	GENERAL LIABILITY X COMMERCIAL GENERAL LIABILITY [ ] CLAIMS MADE [X] OCCUR. OWNER'S & CONTRACTOR'S PROT	299019652 738000167 (TX) AGG PER PROJ	12/10/91	12/10/92	GENERAL AGGREGATE PRODUCTS-COMP/OP AGG PERSONAL & ADV INJURY EACH OCCURRENCE FIRE DAMAGE (Any one fire) MED EXPENSE (Any one person	$ 2000000 $ 1000000 $ 1000000 $ 1000000 $ 100000 $ 10000
A	AUTOMOBILE LIABILITY X ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS GARAGE LIABILITY	299019651 745000655 (TX)	12/10/91	12/10/92	COMBINED SINGLE LIMIT BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE	$ 1000000 $ $ $
A	EXCESS LIABILITY X UMBRELLA FORM OTHER THAN UMBRELLA FORM	299019653	12/10/91	12/10/92	EACH OCCURRENCE AGGREGATE	$ 10000000 $ 10000000
B	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	SEE ATTACHED	12/10/91	12/10/92	X STATUTORY LIMITS EACH ACCIDENT DISEASE-POLICY LIMIT DISEASE-EACH EMPLOYEE	 $ 100000 $ 500000 $ 100000
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

CYRIL FRANCOIS & ASSOC (OWNER)
L'HENRI, INC. (TENANT)
#5 ANA'S RETREAT
ST. THOMAS, USVI 00802

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES

AUTHORIZED REPRESENTATIVE

015037000

ACORD 25-S (7/90)

TUT 003 1400

GERAGHTY & MILLER INC.

WORKERS COMPENSATION POLICIES
(12/10/91 - 92)

CARRIER	POLICY NUMBER	STATES COVERED
Aetna Life & Casualty	094C0021892361CCA	Louisiana
Insurance Co. of North America	C3518465A	Massachusetts
Kemper	3BA01139400	Texas
FCCI Fund	Member #24210	Florida
Atlantic Mutual	400700421	Alabama Colorado Missouri New Mexico North Carolina Oklahoma South Carolina Virginia Tennessee
Atlantic Mutual	401701080	All other States except monopolistic

SOIL TECH

WEEKLY MEETING REPORT - 1
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED : June 1 to June 12, 1992

ATTENDING : Ana Gloria Ramos, Designated Coordinator
Jose R. Vendrell, Esso
Wanda Morales, G&M
Rubén Ponciano, G&M
Clinton Moffatt, G&M
José C. Agrelot, Soil Tech

PREPARED BY : José C. Agrelot, Soil Tech
Project Coordinator

DATE PREPARED : July 9, 1992

FIELD WORK COMPLETED FROM JUNE 1 TO JUNE 12, 1992

- Field work began on June 4, 1992
- During this period borehole B-4 was completed to 11.6 feet. Monitoring well 4-D was cored, reamed, geophysics completed, and the well installed with 48-feet of casing and 20 feet of open hole.
- Monitoring well MW-ID was initiated. Coring to 47-feet was attained.
- Soil sample were collected from B-4, MW-4D, and MW-ID.

PROPOSED SCHEDULE FROM JUNE 12 TO JUNE 18, 1992

- Installation of Monitoring Well MW-4D
- MW-ID will be continue to a depth of 71-feet

- o Geophysics will be completed at MW-ID
- o MW-ID will be reamed and well installed
- o Next wells for drilling are MW-14 and MW-13D.

NEXT MEETING

June 18, 1992

PROBLEMS/SOLUTION

None

JCA/lcr/42407.wpf

SOIL TECH

WEEKLY MEETING REPORT - 2
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED : June 12 to June 18, 1992

ATTENDING : Ana Gloria Ramos, Designated Coordinator
Héctor Lavergne, Soil Tech
Clinton Moffatt, G&M
Fernando Zavala, Soil Tech
Hernán Flores, Esso
José C. Agrelot, Soil Tech

PREPARED BY : José C. Agrelot, Soil Tech
Project Coordinator

DATE PREPARED : July 9, 1992

FIELD WORK COMPLETED FROM JUNE 12 TO JUNE 18, 1992

- MW-3 was completed to 31.0 feet.
- MW-ID was cored to 89.0 feet and geophysical log completed.
- Drill rig CME-55 was moved to MW-13D. Expected drilling depth 115-feet.
- Drilling rig B-90 was set-up at MW-ID for reaming and final well installation.
- Air stripping unit was installed.

PROPOSED SCHEDULE FOR JUNE 18 TO JUNE 25, 1992

- Completion of monitoring well MW-ID
- Core drilling of MW-13D

- o Surge tank delivery to complete the air stripping installation is pending.
- o Begin drilling at MW-1 or MW-5.

NEXT MEETING

June 25, 1992

PROBLEMS/SOLUTION

None

JCA/lcr/42407.wpf

SOIL TECH

WEEKLY MEETING REPORT - 3
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED : June 19 to June 25, 1992

ATTENDING : Ana Gloria Ramos, Designated Coordinator
Clinton Moffatt, G&M
Fernando Zavala, Soil Tech
José M. Cardona, Soil Tech

PREPARED BY : José M. Cardona, Soil Tech
Project Manager

DATE PREPARED : July 9, 1992

FIELD WORK COMPLETED FROM JUNE 18 TO JUNE 25, 1992

- Finished coring and reaming of 13-D.
- Drilling of 1D continues.
- Logging of 13-D attempted.
- Visit to boring locations at Tillet, O'Henri, and Church (12-D).
- Access agreement for Four Winds Plaza signed by TEIC.
- Access agreement for O'Henri obtained.

PROPOSED SCHEDULE FOR JUNE 25, 1992 to JULY 2, 1992

- Finish drilling at 1D.
- Begin drilling at MW-11D.

- o Begin drilling at MW-12D.
- o Begin drilling at MW-1.

NEXT MEETING

July 9, 1992

PROBLEMS/SOLUTION

- o Air Compressor broke down/replace damaged part.

JCA/lcr/42407.wpf

WANDA I. MORALES

Staff Scientist/Geologist

CREDENTIALS/REGISTRATION

B.S. Geology, University of Puerto Rico, 1985

PROFESSIONAL AFFILIATIONS

Geological Society of Puerto Rico
National Water Well Association
Puerto Rico Water Resources Association

FIELDS OF SPECIALIZATION

- Monitoring well installation and sampling.
- Ground-water contamination assessments.
- Implementation of RCRA closure plans for industrial facilities.

EXPERIENCE SUMMARY

Prior to joining Geraghty & Miller, Inc., Ms. Morales was employed by Law Environmental-Caribe of San Juan, Puerto Rico for 5 years as a geologist and project geologist. She has been involved in ground-water contamination and remediation projects in Puerto Rico. She has coordinated and supervised drilling activities for hydrogeological assessments and geotechnical explorations. She has been involved in the performance and documentation of RCRA closure plan activities for several industrial facilities in Puerto Rico. Ms. Morales also worked as a field geologist for a local consulting firm in San Juan, Puerto Rico.

KEY PROJECTS

- Supervised test drilling for a hydrogeological assessment at a landfill site in Puerto Rico. Responsible for drilling activities documentation, soil and rock samples description, and classification and monitoring well installation.

- Coordinate and supervise drilling activities for underground storage tanks assessments in industrial facilities and gas stations in Puerto Rico. Hydrogeological assessment included drilling activities, soil and water sampling, field screening of samples with an organic vapor analyzer, monitoring well installation, data reduction, and report preparation.

- Coordinate and supervise test drilling for geotechnical exploration for dam safety investigations in Puerto Rico. Responsible for site activities documentation, soil and rock samples description and classification, and monitoring well and piezometer installation.

- Coordination and implementation of RCRA closure plans for several industrial sites in Puerto Rico. Activities included closure of container storage areas, surface impoundments, and solid waste management units. Responsible for sampling coordination and performance, site activities surveillance and documentation, data reduction, and report preparation.

- Performance of aquifer test for a hydrogeological investigation in Río Grande, Puerto Rico. Project included permit acquisition from regulatory agency, test well and observation well installation, and pumping test coordination and performance.

2/92

RESUME

DANIEL A. BINGHAM
13112 Shadberry Lane
Bayonet Point, FL 34667
(813) 869-1876

SUMMARY OF QUALIFICATIONS:

Seven years experience in selling of computerized pollution monitoring instruments as a sales agent/trainer. Five years as a proprietor and manager of a sales representative company. Over ten years experience in analytical chemistry research, methods development, sample analyses, groundwater sampling and monitoring, technical writing and air monitoring for hazardous waste site investigations and remedial work.

EXPERIENCE:

March 1987 to Present

BINGHAM ENVIRONMENTAL TECHNOLOGIES, INC.
Post Office Box 878
New Port Richey, Florida 34656

Position: Vice President

Established and manage Bingham Environmental Tech., Inc. as a manufacturer's representative for products used in hazardous waste and geotechnical investigations Generated over $800,000.00 product sales for the year of 1990 in the southeastern US. Contracted for the following:

-- Design air sampling protocols for remediating hazardous waste sites.
-- Train personnel for air sampling and monitoring.
-- Perform on-site analyses of soil gas, soil, and groundwater samples using a portable gas chromatograph.
-- Soil gas, soil, and groundwater sampling using a KV System.

Oct. 1985 to March 1987

PHOTOVAC INTERNATIONAL INC.
741 Park Avenue
Huntington, New York 11743

Position: Customer Service Coordinator

Responsible for developing, staffing and operating Photovac's USA Repair and Service Center. The service center provides an applications advisory service for customers and conducts investigations into new application areas for Photovac products. Responsible for training sales agents and customers to use Photovac instruments; developing the course curriculums. Represented Photovac at trade exhibitions and conferences focusing on hazardous waste.

Oct. 1983 to Oct. 1985

IT Corporation under contract the US Environmental Protection Agency, Emergency Response Branch in Edison, New Jersey.

Position: Environmental Technologist

Managed Operations Group "Air Monitoring Program" includes:

-- Air Monitoring Project Planning and Management.
-- Operation, Maintenance, and Calibration of Personal Monitoring Pumps.
-- Photovac GCs Operations, Maintenance, and Calibration.
-- Air Monitoring QA/QC.
-- In-house Air Monitoring Training.

Assisted the ERB in Hazardous waste site investigations and executing remedial actions on waste sites including:

-- Develop methods for determining the extent of contamination.
-- Assist in implementing work plans for EPA Superfund Sites.
-- Evaluate analytical instrumentation for field use, (CSI XRAY FLUORESCENCE INSTRUMENTS.)
-- Perform field and lab analyses using analytical instruments.
-- Perform hazardous waste site clean-up operations innovative and standard procedures.
-- Fabricate, assemble and test equipment.
-- Prepare field response reports.
-- Supervise contract personnel.
-- Coordinate logistical support:
-- Sample complex matrices in hazardous environments.

May 1981 to Oct. 1983

IT Corporation under contract granted by the Oil & Hazardous Materials Spills Branch of the US Environmental Protection Agency, Edison, New Jersey.

Position: Analytical Technologist

Coordinated research activities in an R&D Laboratory to develop rapid field oriented methods for analyzing samples containing hazardous chemicals in complex environmental matrices. Proficient in the operation of computerized Gas and Liquid Chromatographs, Argon Plasma Emission Spectrometers, GC/MS, TOC Analyzers, and Data Processing Systems. Supervised personnel during emergency response mobile laboratory field activations.

Authored and presented the following papers:

1. "The Use of Photoionization Detector Instruments In Hazardous Spills Evaluation", presented at the Third Annual Technical Seminar on Chemical Spills in Montreal, 1986.
2. "Soil Gas Sampling Procedure"; presented at the Hazardous Materials Conference in Chicago, October 1986.
3. "Preparation of Aqueous Standards for Groundwater Analysis".

EDUCATION:

1982 — William Paterson College, Wayne, New Jersey — B.A. Environmental Science-Emphasis in Chemistry

SERVICE:

1974 — U.S. Air Force, honorably discharged

RESUME

KENNETH A. KANIZAR
7119 Seward Drive
Port Richey, FL 34668
(813) 863-5013

SUMMARY OF QUALIFICATIONS: Six months experience operating and selling of computerized pollution monitoring instruments. 11 years training/operating and using computer equipment.

EXPERIENCE:

January 1992 to Present

BINGHAM ENVIRONMENTAL TECHNOLOGIES, INC.
10816 U.S. Highway 19, Port Richey, FL

Position: Sales Representative/Technician

GC analysis operating several different types of equipment such as (Photovac 10S Plus, Microtip, KV Hefty System, INW Data Logger, Pressure Transducers).

June 1981 to March 1992

UNITED STATES AIR FORCE

1981-84 USAF, United Kingdom,
Operated radio receivers. recording equipment, frequency equipment, and teletype equipment. Scans selected portions of the frequency spectrum, tunes, calibrates and operates computer equipment. Section chief and responsible for thirteen individuals. This position is usually held by individual three levels higher. Completed all training with a 94% average. On five different evals I was error free. I was then selected to attend a very high level analysis course. This course only takes the top one percent of the overall spectrum. It was created to enhance the analytical abilities of key personnel.

1984-1985 USAF, Crete,
Section chief of two areas and responsible for over 25 individuals. Qualified in minimum time period 100%. Increased overall productivity by 500% in a three month period. I was then tasked to train other duty sections and bring the entire operation up to speed. I was recognized on several occasions as outstanding operator of the base. I was then placed in the position as On the Job Training Supervisor. This position is usually held five levels above my actual level.

Later in 1984 early 1985 I was charge with the responsibility of a third section and another five individuals.

1985-86 USAF, South Carolina, 16th Reconnaissance Squadron
Operations Resource Management
Monitors, collects, and audits operation system products data pertaining to aircrew personnel. Provides automated data information to supervisors in monitoring aircrew training. Operates data processing equipment. Updates flying hours used as statistical data for resource management requirements. Aids in analyzing data for training information. Provides operations support during combat flight generations and operational readiness exercises. I was recognized for outstanding contributions during a Joint NATO Operation Readiness Inspection.

1986-90 USAF, South Carolina, 21st Tactical Support Squadron
Operations Resource Management
Supervised four noncommissioned officers and airmen. Operated manual and automated data systems to document all flying and ground training accomplishments over 90 pilots. Schedules military operating airspace which supports five fighter wings. Ensures close air support training with multiple aircraft is integrated into daily flying schedule. Produced the first computerized scheduling program which reduced manpower requirements. Now procedures would only take minutes versus hours. I then produce the first of many data management programs which tracked individuals and there daily schedules. This prevented overlaps and increased time management. Next was a program to track daily, monthly, and yearly goals and achievements. This coupled with the scheduling program and the deconfliction program allowed an overall picture of training and trends to be formed. This information was then used to adjust training programs to meet these needs.

1990-92 USAF, South Carolina, 20th Tactical Support Squadron
Operations Resource Management
In the beginning of 1990 I was ordered to start a new squadron. I was to create all data bases and introduce a Local Area Network into the

flying operations. This system consisted of one dedicated server and ten independent work stations. Each work station is a separate office in it's own minor data base. This LAN increased the effectiveness of the Squadron and reduced correspondence and feedback intervals. Further Telecommunication capabilities allowed increased continuity between organizations. During Dessert Shield/Storm I created procedures to track individuals as they deployed to the conflict. I installed full page scanners in all of the bases squadrons and was a point of contact for the southern united states. This allowed the reduced manpower at the squadrons to process data as it came back from the forward area.

EDUCATION:

1981 Hudson High School, Fl.

1981 Basic Training USAF

1982 Basic Morse Systems Operations

1983 Intro Supervisory/Management Course

1984 Advanced System Development Analysis Course

1985 Intro Small computer programming

1986 Airfield Management

1987 Advanced Personnel Management

1987 Equipment Management Course

1987 First Aid Instructor Course

1987 Personnel Safety Course

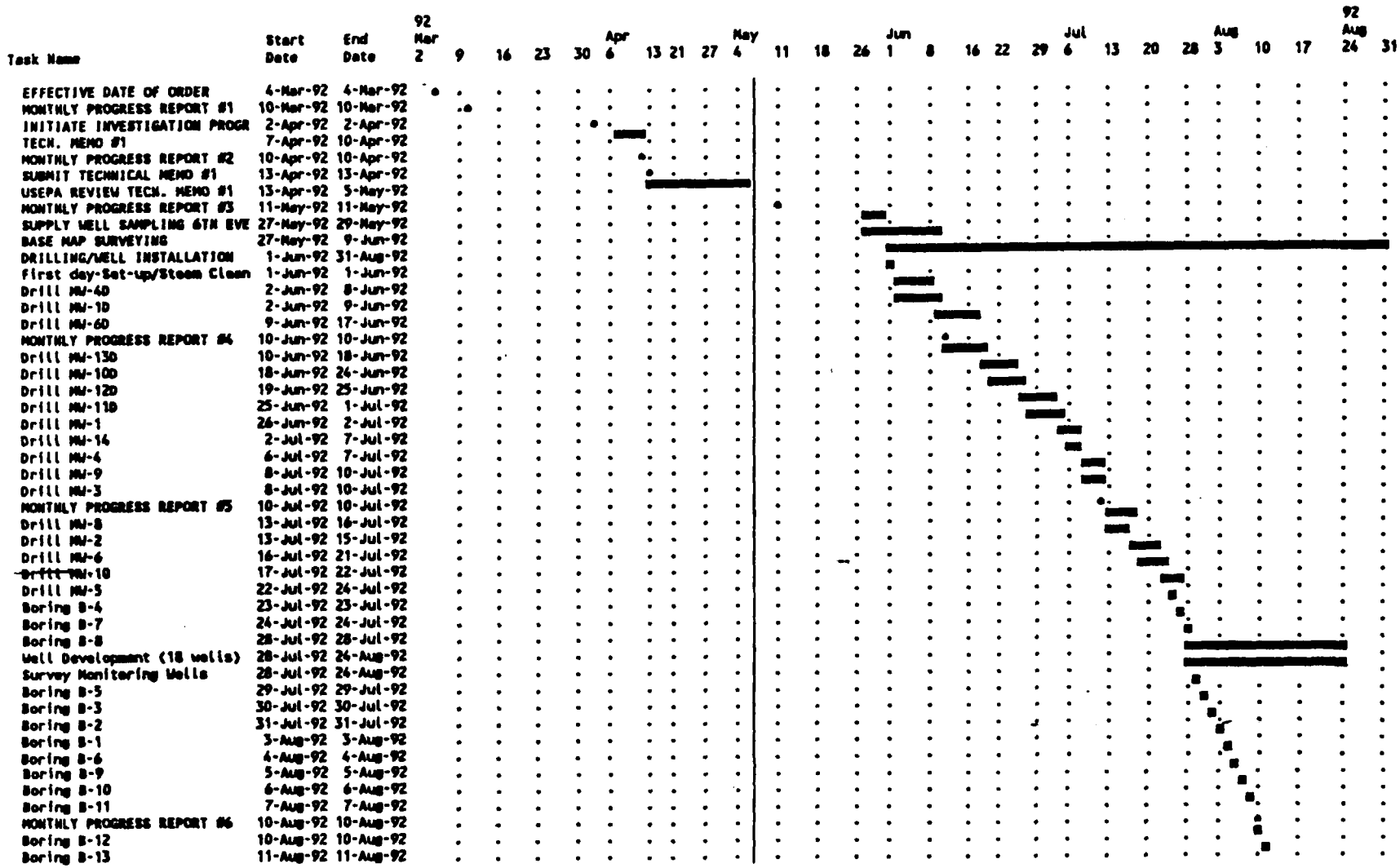
1991 Advanced Micro E systems course

1992 Advance Confidence Course

SERVICE: U.S. AIR FORCE 1981-1992, Honorably discharged

Schedule Name : TUTU SERVICE STATION INVESTIGATION, ST. THOMAS, USVI
Responsible : GERAGHTY & MILLER, INC. PROJECT #: PR01301
As-of Date : 6-May-92 Schedule File : TUTUDRIL

Highlight (1) : Updating



Task Name	Start Date	End Date
EFFECTIVE DATE OF ORDER	4-Mar-92	4-Mar-92
MONTHLY PROGRESS REPORT #1	10-Mar-92	10-Mar-92
INITIATE INVESTIGATION PROGR	2-Apr-92	2-Apr-92
TECH. MEMO #1	7-Apr-92	10-Apr-92
MONTHLY PROGRESS REPORT #2	10-Apr-92	10-Apr-92
SUBMIT TECHNICAL MEMO #1	13-Apr-92	13-Apr-92
USEPA REVIEW TECH. MEMO #1	13-Apr-92	5-May-92
MONTHLY PROGRESS REPORT #3	11-May-92	11-May-92
SUPPLY WELL SAMPLING 6TH EVE	27-May-92	29-May-92
BASE MAP SURVEYING	27-May-92	9-Jun-92
DRILLING/WELL INSTALLATION	1-Jun-92	31-Aug-92
First day-Set-up/Steam Clean	1-Jun-92	1-Jun-92
Drill MW-4D	2-Jun-92	8-Jun-92
Drill MW-1D	2-Jun-92	9-Jun-92
Drill MW-6D	9-Jun-92	17-Jun-92
MONTHLY PROGRESS REPORT #4	10-Jun-92	10-Jun-92
Drill MW-13D	10-Jun-92	18-Jun-92
Drill MW-10D	18-Jun-92	24-Jun-92
Drill MW-12D	19-Jun-92	25-Jun-92
Drill MW-11D	25-Jun-92	1-Jul-92
Drill MW-1	26-Jun-92	2-Jul-92
Drill MW-14	2-Jul-92	7-Jul-92
Drill MW-4	6-Jul-92	7-Jul-92
Drill MW-9	8-Jul-92	10-Jul-92
Drill MW-3	8-Jul-92	10-Jul-92
MONTHLY PROGRESS REPORT #5	10-Jul-92	10-Jul-92
Drill MW-8	13-Jul-92	16-Jul-92
Drill MW-2	13-Jul-92	15-Jul-92
Drill MW-6	16-Jul-92	21-Jul-92
Drill MW-10	17-Jul-92	22-Jul-92
Drill MW-5	22-Jul-92	24-Jul-92
Boring B-4	23-Jul-92	23-Jul-92
Boring B-7	24-Jul-92	24-Jul-92
Boring B-8	28-Jul-92	28-Jul-92
Well Development (18 wells)	28-Jul-92	24-Aug-92
Survey Monitoring Wells	28-Jul-92	24-Aug-92
Boring B-5	29-Jul-92	29-Jul-92
Boring B-3	30-Jul-92	30-Jul-92
Boring B-2	31-Jul-92	31-Jul-92
Boring B-1	3-Aug-92	3-Aug-92
Boring B-6	4-Aug-92	4-Aug-92
Boring B-9	5-Aug-92	5-Aug-92
Boring B-10	6-Aug-92	6-Aug-92
Boring B-11	7-Aug-92	7-Aug-92
MONTHLY PROGRESS REPORT #6	10-Aug-92	10-Aug-92
Boring B-12	10-Aug-92	10-Aug-92
Boring B-13	11-Aug-92	11-Aug-92

Detail Task (Progress) (Slack) — Summary Task (Progress) (Slack) — Baseline — Conflict — Resource delay — Milestone
Progress shows Percent Achieved on Actual
Scale: 8 hours per character

TUT 003 1416

DIVISION OF
ENVIRONMENTAL PROTECTION
TDD (809) 777-8413

GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES

DEPARTMENT OF PLANNING AND NATURAL RESOURCES
NISKY CENTER, SUITE 231
NO. 45A ESTATE NISKY
CHARLOTTE AMALIE, ST. THOMAS, V.I. 00802

May 11, 1992

Soil Tech Corp.
P. O. Box 6105
St. Thomas, Virgin Islands 00801

Dear Sir/Madam:

This is to certify that the Department of Planning and Natural Resources (DPNR) has given Soil Tech Corp permission to drill seventeen (17) test wells in the Tutu area.

Monitoring wells will be at drilled at different depths and will be four (4) to six (6) inches in diameter. They will have four (4) to six (6) inches of stainless steel casing, and will be sealed with bentonite and grouts. At the surface they will have manholes with nuts, and/or protective metal casing with locks.

These wells are to be used as test wells and must be secured after all tests are completed.

Well Permit numbers would be St-3003a - St-3003q respectively.

Sincerely,

Roy E. Adams
Commissioner

REA/IH/rei

TUT 003 1417

GOVERNMENT OF THE VIRGIN ISLANDS
DEPARTMENT OF PLANNING AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

WELL DRILLING PERMIT

NEW PERMIT (X) RENEWAL PERMIT ( )

In accordance with the provisions of Title 12, Chapter 5, Virgin Islands Code, as amended, a Well Drilling Permit is hereby issued to:

Soil Tech Corp
(NAME OF WELL DRILLER)

WDL-013-92
(LICENSE NUMBER)

P. O. Box 6105, STT 777-7505
(MAILING ADDRESS & TELEPHONE NO.)

to drill 17 well(s) at Charlotte Amalie/Annas Retreat, according to the plan submitted in application for this permit and approved by your well inspector. This permit is granted with the following conditions:

1. Well log shall be completed and delivered to the Office of the Commissioner of Planning and Natural Resources within fourteen (14) days after completion of the well drilling operation, for each hole drilled.

2. Each well shall have an opening of not less than 3/4 inch in diameter for the measurement of water level by means of a wetted steel tape.

3. Water samples shall be furnished upon request.

The Commissioner of the Department of Planning and Natural Resources shall have the power to revoke or suspend this permit upon finding, after public notice and adequate hearing, that such revocation or suspension is in the public interest; provided, that any person aggrieved by any such decision of the Commissioner shall be entitled to a review of the same by the District Court upon appeal made within thirty (30) days from the date of the decision; provided, further, that all decisions of the Commissioner shall be final except upon findings by the District Court that the same was arrived at by fraud or illegal means.

TUT 003 1418

This permit is valid from May 7, 1992 to May 7, 1993.
If a renewal is desired, the holder is responsible for making application for same without any notice from this office. In the event of failure to do so, it will be understood that the permit has expired.

Commissioner of Planning and Natural Resources

MAY 1 5 1992

Date

Well Drilling Permit No. ST-3003a to ST-3003q

Reference: Soil Tech Corp (property owner)

GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES

DEPARTMENT OF PLANNING AND NATURAL RESOURCES

Division of Permits
#179 Altona & Welgunst
Charlotte Amalie
St. Thomas, U.S.V.I. 00801
(809) 774-3320

Anna's Hope
Public Works Facility
St. Croix, U.S.V.I. 00850
(809) 773-1082/3250

EARTH CHANGE PERMIT APPLICATION

STT-331-92
PERMIT NUMBER.

1. OWNER/APPLICANT INFORMATION
   - A. OWNER: Different owners with address. SEE Owner & Address Listing (ATTACHMENT NO. 2)
     ADDRESS: _____
     TEL. # _____
   - B. AUTHORIZED AGENT: Tutu Environmental / Investigation Committee
     ADDRESS: P.O. Box 6105 Veteran Drive Sta. USVI
     TEL. # 4-0142 h 7-7505 w (809) 792-8900 collect
   - C. DESIGNER: Geraghty & Miller Inc. Agrelot
     LIC.# P.O. Box 273630, Tampa Florida
     TEL.#
   - D. EQUIPMENT OWNER: Soil Tech Corp
     ADDRESS: P.O. Box 6005 Veteran Drive Sta. USVI
     TEL. # 777-7505

5/6/92 24 hr N. Grant

2. PROPERTY DESCRIPTION
   - LEGAL DESCRIPTION: SEE Property Listing & Access Agreement (ATTACHMENT 3)
   - ESTATE: ANNA'S RET
   - GENERAL LOCATION: TUTU AREA
   - QUARTER: INCW Quarter ISLAND: ST. THOMAS
   - LOT SIZE: HH Acres
   - ZONING DISTRICT: B-2 - C
   - COASTAL ZONE MANAGEMENT: TIER I _____ TIER II X
   - SOIL TYPE (s) CvE/LaB

3. PROPOSED ACTION(S) CIRCLE THOSE THAT APPLY

A. LAND CLEARING	E. LAND SUBDIVISION
B. CONSTRUCTION	F. TREE REMOVAL/PLANTING
C. EXCAVATION	G. CUT AND FILL
D. ROAD BLDG./ REPAIR	H. OTHER (DESCRIBE)

I. BRIEFLY DESCRIBE THE TOTAL SCOPE, INCLUDING THE END RESULT OF PROPOSED DEVELOPMENT(S).
Soil Borings and Air Stripping Unit for Environmental Investigation AS PER EPA order Index # II-RCRA 7003-J 9003 92-0401

TUT 003 1420

4. BUILDING AND CONSTRUCTION SPECIFICATIONS
PLEASE REFER TO THE ATTACHED HANDOUT(S) WHICH LIST THE SPECIFICATIONS THAT MUST BE SUBMITTED IN ORDER FOR YOUR APPLICATIONS TO BE CONSIDERED COMPLETE. (THREE COPIES OF DRAWINGS REQUIRED FOR SITE AND FLOOR PLANS. PREFERRED SCALE IS 1" = 20' OR 1" = 10'.
IN ADDITION, PLEASE PROVIDE THE FOLLOWING INFORMATION:
LOWER FLOOR FINAL ELEVATION: _____
ELEVATIONS OF LOT CORNERS: _____
CISTERN OVERFLOW PIPE(S) INVERT ELEVATION: _____
SEPTIC TANK TOP ELEVATION: _____

5. REQUIRED SUBMITTALS
A. SUBMIT ONE (1) COPY OF THIS APPLICATION WITH THE FOLLOWING MAPS FOR EVALUATION. PLOT TO SCALE THE SITE LOCATION ON ALL MAPS, AS AVAILABLE.

1. OFFICIAL ZONING MAP
2. FEMA FLOOD INSURANCE MAP
3. SURVEY OR PLAT
4. WATER RESOURCES MAP
5. SEDIMENT REDUCTION PROGRAM MAP
6. SOIL SURVEY - SOIL MAPS
7. COPY OF DEED

6. SIGNATURE BLOCK

I/WE HEREBY CERTIFY THAT TO THE BEST OF OUR KNOWLEDGE, ALL INFORMATION SUBMITTED IS ACCURATE AND CURRENT. I/WE ACKNOWLEDGE THAT THIS APPLICATION WILL BE REVIEWED FOR COMPLETENESS AND COMFORMITY WITH THE V.I. ZONING CODE PRIOR TO PROCESSING. IT IS ALSO EXPRESSLY ACKNOWLEDGED THAT THE COMMENTS OF THE V.I. SOIL & WATER CONSERVATION DISTRICT ARE ONLY A RECOMMENDATION TO DPNR. FINAL AUTHORITY AND RESPONSIBILITY FOR EARTH CHANGE PERMITS RESTS WITH DPNR.

OWNER: _____ APPLICANT/AGENT: Soil Tech

DATE: _____ DATE: May 6 1992

CERTIFICATE OF ARCHITECT, ENGINEER, OR LAND SURVEYOR

DATE: _____ LICENSE #: _____

7. VIRGIN ISLANDS SOIL & WATER CONSERVATION DISTRICT COMMENTS:
A. SOIL TYPE (s): _____
B. OTHER INFORMATION: _____
C. FINDINGS/CONCLUSIONS: _____

TUT 003 1421

10. NOTE TO APPLICANT

TO FACILITATE FIELD INSPECTION AND PERMIT REVIEW OF THE APPLICATION, THE SITE BOUNDARIES AND AREAS OF IMPACT SHALL BE VISIBLY FLAGGED AND MARKED (EXAMPLES: MARKING S.E CORNER, SOUTHERN BOUNDARY OF DRIVEWAY, ETC.). A PLAQUE OR SIGN INDICATING THE ESTATE AND PLOT NUMBER SHALL BE PLACED IN A VISIBLE LOCATION FROM THE ROAD OR RIGHT-OF-WAY.

EVERY PERMIT ISSUED BY THE DPNR SHALL EXPIRE BY LIMITATION AND BECOME NULL AND VOID IF THE BUILDING OR THE WORK IS NOT COMMENCED 12 MONTHS FROM THE DATE OF THE ISSUANCE, OR IF THE BUILDING OR WORK IS SUSPENDED OR ABANDONED AT ANY TIME AFTER TH WORK IS COMMENCED FOR A PERIOD OF 12 MONTHS. AN EXTENSION OF TIME MAY BE GRANTED BY THE DISTRICT DIRECTOR OF PERMITS

IT IS THE RESPONSIBILITY OF THE APPLICANT, PROPERTY OWNER OR EQUIPMENT OWNER TO NOTIFY THE DPNR PERMIT OFFICE 48 HOURS BEFORE COMMENCING ACTIVITY OR WORK.

11. CONDITIONS OF APPROVAL

D. RECOMMENDATIONS: _____

_____ _____
AUTHORIZED OFFICAL DATE

8. DEPARTMENTAL USE ONLY
A. COMMENTS: _____

_____ 5-6-92
INSPECTOR DATE

7902D
FEE RECEIPT

B. VERIFICATION OF ELEVATIONS
X SATISFACTORY ___ UNSATISFACTORY

9. (APPROVAL)/DENIAL

THIS PERMIT APPLICATION IS X APPROVED ___ DENIED

Gabriel A Amin June 2, 199
DISTRICT DIRECTOR OF PERMITS DATE

CONDITIONS OF APPROVAL.

NO _____ YES X (See #11).

(c) All applications for building or other permits for use of land shall contain at least the following information, unless any specific required information is waived by the Zoning Administrator as not relevant or necessary to determine that all provisions of this subchapter have been met:

A site plan of the property, in duplicate, to a scale not to exceed twenty (20) feet to one (1) inch, prepared by a registered engineer, architect or land surveyor, illustrating the proposed development of the property and including the following:

1. Topographical features showing present grades and any proposed grades if present grades are to be altered. When required by the Zoning Administrator, contours not greater than five (5) feet shall be shown;

2. Property boundary lines and dimensions including any distinguishing platted lot lines within the property;

3. Location and dimensions of buildings, including height in stories and feet and including total square feet of ground area coverage of all existing and proposed buildings;

4. Location and dimensions of all driveways and entrances and minimum yard dimensions and, where relevant, relation of yard dimensions to the height of any side of a building or structure;

5. Location and dimensions of parking stalls, access aisles, and total area of lot coverage of all parking areas and driveways;

6. Location and dimensions, including height clearance, of all off-street loading areas;

7. Location, designation and total area of all usable open space, including use of any paved areas as distinguished from sodded or other landscaped areas;

8. Location and height of fences, walls including retaining walls, or screen planting, and the type or kind of building materials or planting used;

9. Proposed surface drainage;

10. Location of easements or other rights-of-way;

11. Location and designation of any open storage space;

12. The use of existing and proposed buildings, including the number of dwelling units in any building and the number of bedrooms in each dwelling unit in any building occupied or proposed to be occupied by more than two (2) dwelling or apartment units. This shall be supplemented by a summary schedule of all existing or proposed dwelling types set forth in the Table of Density Regulations of this subchapter;

13. In residential buildings, any existing or proposed commercial accessory uses as permitted by this subchapter shall be located and designated;

14. The total floor area in any commercial or mixed commercial-residential building which is governed by this subchapter by a floor area ratio (F.A.R.) factor. If a mixed commercial-residential occupancy, the location and total floor area of any commercial part of the building governed by a floor area ratio shall be shown;

15. Any information pertaining to a use conditionally permitted, where necessary to determine that the conditions for that use are met, or any information necessary to determine that the amount of off-street parking required by this subchapter is met.

A location map, in duplicate, at a scale not to exceed two hundred (200) feet to one (1) inch showing, at least, the uses of all property across the street or alley from or adjoining the boundary of the subject property, including the following:

1. All streets, alleys or other public rights-of-way, public parks and places and all lots and lot lines, streams, guts, waterways and easements;

2. All structures and the principal use of each structure, including the kind of residential, business, commercial, industrial or waterfront use;

3. All parking areas as may be significant to the application in question.

Any *other information* as may be required by the Zoning Administrator to determine that the application is in compliance with this subchapter shall be furnished upon demand, including but not limited to flood plans, elevations, profiles, perspectives or any other material necessary to a complete understanding of this application.

A statement in writing signed by the applicant stating that the information as shown on said plans is true and correct. Any failure to comply with the provisions of this subchapter shall be good cause to refuse the issuance of any permit and/or to revoke any permit which may have been issued for any building or use of land.

Any application properly submitted under this section shall be acted upon by the Zoning Administrator within *sixty* (60) days.

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

August 10, 1992

Eng. Caroline Kwan
Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
US Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

RE: Tutu Well Site
Administrative Order on Consent
Index No. II-RCRA-Proceeding
7003 and 9003-92-0401
Monthly Progress Report No. 6

Dear Mrs. Kwan:

Attached find the Written Monthly Progress Report for the subject Administrative Order.

If you have any question regarding this matter, please contact the undersigned at (809) 749-8943.

Very truly yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

AGR/mpt/EPAKWAN

Attachments

pc: Mr. J. Juanet
Mr. D. Lee
Scott McCay, Esq. - Texaco
Mr. L. Ruiz - Texaco
José A. Cepeda/Francis Torres, Esqs.
Mr. José Font - EPA Caribbean Field Office
Mr. Roy E. Adams - Commissioner DPNR-USVI
Mr. Leonard Reed/ Benjamin Nazario - DPNR-USVI

TUT 003 1425

Telephone: (809) 792-2920 Fax. (809) 793-6555

MONTHLY PROGRESS REPORT NO. 6
August 10, 1992

RE: Administrative Order on Consent
Index No. II - RCRA - Proceeding
7003 & 9003-92-0401

WORK COMPLETED DURING THE MONTH

1. A site access agreement with Four Winds Plaza Associates has been negotiated (copy of Agreement attached).

2. Drilling field work continued in July. As of July 31, 1992 12 monitoring wells have been completed, including MW-1, MW-1D, MW-3, MW-4, MW-4D, MW-7, MW-8, MW-9, MW-11D, MW-12D, MW-13D, and MW-14. As of July 31, 1992, MW-6D was partially completed (i.e. soil sampling complete; coring and reaming in progress).

3. Installation of the temporary treatment system for the pumping test is nearly completed.

4. Downhole geophysical logging using sonic and caliper tools was performed in the corehole at MW-13D.

5. Soil samples from the soil borings have been analyzed using the field gas chromatograph. Based upon photo ionization detector (i.e., HNU) results, soil samples have been collected and shipped for laboratory analysis in accordance with the work plan.

6. Order to site access for Gasset Auto Parts prepared by DPNR and signed by the Commissioner. As of the end of the month, the Order has not been served (copy attached).

Note: Copy of Progress Report meeting conducted at the site during the month are attached for reference only.

WORK TO BE COMPLETED DURING NEXT MONTH

The work to be completed by August 31, 1992 is summarized below:

1. Continued drilling activities at Monitoring Wells MW-2, MW-5, MW-6, MW-6D, MW-10, and MW-10D.

2. Surficial soil sampling at Curriculum Center Building (former Laga Building), Tillett property, and O'Henri property.

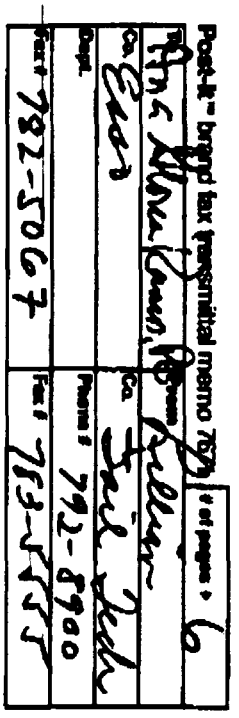
4. Monitoring well development will be initiated and will continue into September.

ANA GLORIA RAMOS

SOIL TECH

WEEKLY MEETING REPORT - 4
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED	:	June 25 to July 10, 1992
ATTENDING	:	Ana Gloria Ramos, Designated Coordinator Clinton Moffatt, G&M Dave Bingham, Soil Tech José C. Agrelot, Soil Tech
PREPARED BY	:	José C. Agrelot, Soil Tech Project Coordinator
DATE PREPARED	:	August 7, 1992



FIELD WORK COMPLETED FROM JUNE 25 TO JULY 10, 1992

- o MW-1 was completed by July 1, 1992.
- o MW-ID was finished by July 10, 1992.
- o Coring at MW-11D was completed by July 1, 1992.
- o Coring at MW-12D was initiated on July 7, 1992.
- o Reaming of MW-13D started on July 9, 1992.
- o MW-14 was completed by July 2, 1992.

PROPOSED SCHEDULE FROM JULY 10 TO JULY 21, 1992

- o Complete MW-12D.
- o Begin drilling at MW-5, 7, and 8.
- o Reaming at MW-13D, 11D, and 12D.

NEXT MEETING

July 21, 1992

PROBLEMS/SOLUTION

- Pending are Gassett and Four Winds Shopping Center access agreements.

JCA/lvl/42453.wpf/92-1240

SOIL TECH

WEEKLY MEETING REPORT - 5
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED	:	July 10 to July 21, 1992
ATTENDING	:	Ana Gloria Ramos, Designated Coordinator Clinton Moffatt, G&M José C. Agrelot, Soil Tech José M. Cardona, Soil Tech
PREPARED BY	:	José C. Agrelot, Soil Tech Project Coordinator
DATE PREPARED	:	August 7, 1992

FIELD WORK COMPLETED FROM JULY 10 TO JULY 21, 1992

- MW-13D was completed on July 17, 1992.
- MW-11D was completed on July 20, 1992.
- Augering and soil sampling were initiated at MW-6D, 7, and 8.
- Site access agreement to Four Winds Shopping Mall was received on July 16, 1992.

PROPOSED SCHEDULE FOR JULY 21 TO JULY 31, 1992

- Completion of monitoring well MW-12D
- Core drilling of MW-6D, MW-9, and MW-10D
- Installation of MW-7 and MW-8.

TUT 003 1430

- Surge tank was received. The air stripping installation is schedule for the week of July 31, 1992.

NEXT MEETING

July 31, 1992

PROBLEMS/SOLUTION

- During drilling of MW-12D the hole collapsed and some drilling tools were lost. The hole was sealed and a new borehole was initiated.
- Gassett access permit is pending.

JCA/lvl/42453.wpf

SOIL TECH

WEEKLY MEETING REPORT - 6
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED	:	July 21 to July 31, 1992
ATTENDING	:	Ana Gloria Ramos, Designated Coordinator Wanda Morales, G&M Ken Kenazar, Soil Tech Clinton Moffatt, G&M José M. Cardona, Soil Tech José C. Agrelot, Soil Tech
PREPARED BY	:	José C. Agrelot, Soil Tech Project Coordinator
DATE PREPARED	:	August 7, 1992

FIELD WORK COMPLETED FROM JULY 21 TO JULY 31, 1992

- Core drilling of MW-6D was completed by July 23, 1992.
- Installation of MW-7, MW-8, MW-9, and MW-12D were completed.
- A meeting was held between Engr. Ana Gloria Ramos, Designated Coordinator and Miss Lisa Beltrán of Splash-Dash related to the drilling schedule at this site. It was agreed that all work will be conducted between 7:30 PM until 5:00 AM; Monday through Thursday.
- A copy of the DPNR Order to Gassett for access was obtained from Mr. Leonard Reed of DPNR.

PROPOSED SCHEDULE FROM JULY 31 TO AUGUST 14

- o Installation of Monitoring Well MW-10 and 10D.
- o Drilling at B-2, B-3, and B-13.

NEXT MEETING

August 14, 1992

PROBLEMS/SOLUTION

None

JCA/lvl/42453.wpf

GOVERNMENT OF THE VIRGIN ISLANDS

DEPARTMENT OF PLANNING AND NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL PROTECTION

IN THE MATTER OF THE DEPARTMENT OF PLANNING AND NATURAL RESOURCES, ROY E. ADAMS, COMMISSIONER COMPLAINANT, vs. THOMAS GASSETT, INDIVIDUALLY AND THOMAS GASSETT D/B/A GASSETT AUTO MALL, ST. THOMAS, VIRGIN ISLANDS, RESPONDENT.	ORDER TEIC 01-92

I. AUTHORITY

Pursuant to 12 V.I.C. Sec. 188 (d); and 12 V.I.C. Sec. 189, the Commissioner has the authority to declare that a pollution source or combination of sources are presenting an imminent and substantial danger to the health and welfare of the public; and may order the inspection and entry onto land within the Territory to carry out the purposes of the Water Pollution Control Act.

II. FINDINGS OF FACT

A. Since July, 1987, the Department of Planning and Natural Resources (DPNR) and the United States Environmental Protection Agency (EPA) have been involved in the sampling and testing of identified water wells in the Tutu section of Anna's Retreat within the Tutu Water/Turpentine Run Aquifer. This testing has taken place because contaminants were found in both wells and cisterns within this area.

B. In order to protect the public health and welfare, DPNR ordered the closing of a number of commercial and residential wells within the affected area.

C. In February, 1992 the EPA entered into an Administrative Order of Consent with Esso Standard Oil S.A., Limited and Texaco Caribbean, Inc., to determine the vertical and horizontal nature and extent of soil and ground water contamination; and the rate and direction of contamination movement.

D. In order to implement this Administrative Order of Consent, to carry out the purposes of the Water Pollution Control Act and to protect the health and welfare of the public from what is considered to be an an imminent health hazard, it is necessary for representatives of DPNR, EPA, Esso Standard Oil S.A., Limited and Texaco Caribbean, Inc., to enter on and test the soil and water on land which is leased and occupied by Gassett Auto Mall.

E. All prior orders of both DPNR and EPA are hereby relied upon and incorporated by reference.

ORDER

In consideration of the foregoing, Thomas Gassett, individually and Thomas Gassett d/b/a Gassett Auto Mall, his agents, representatives and employees are hereby ORDERED to permit DPNR, EPA, Esso Standard Oil S.A., Limited and Texaco Caribbean, Inc., its agents and representatives to enter upon its land for the purpose of conducting soil and water sampling.

Failure to comply with this ORDER subjects Thomas Gassett, individually and Thomas Gassett d/b/a Gassett Auto Mall to Civil penalties pursuant to the Virgin Islands Code.

SO ORDERED this 23rd day of July, 1992.

Roy E. Adams, Commissioner

If you have any questions, please contact Leonard Reed, Assistant Director, Division of Environmental Protection at 809-774-3320.

Receipt of the within Order is hereby acknowledged.

_____ (Date)

_____ (Received By)

Served Upon _____

by_____, _____. (date)

REA/LHS/eeh

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

TO: MAILROOM FOR FACSIMILE TRANSMISSION

TO:	Name: Mr. Clinton Moffat
	Company & Address: Y & M
	St. Thomas, USVI
FROM:	Name: Ana Gloria Ramos
	Company & Address: San Juan

FOR COMMUNICATIONS USE ONLY

Submitted By	Charge Code	Date Submitted	Pages Submitted
Ana Gloria Ramos		8-4-92	4 + Cover

Message sent by	Date sent	Receipt Confirmed (Initial & Date)

Clinton:

Copy of the agreement for the drilling near Splash & Dash.

Please follow all requirements during the time that you are at that site.

TUT 003 1436

Ana Gloria Ramos

Telephone: (809) 792-2920 Fax. (809) 793-6555

GOLDMAN ANTONETTI FERRAIUOLI & AXTMAYER

ATTORNEYS AND COUNSELORS AT LAW

POST OFFICE BOX 70364

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AMERICAN INTERNATIONAL PLAZA
FOURTEENTH FLOOR
250 MUÑOZ RIVERA AVENUE
HATO REY, PUERTO RICO 00918

TELEPHONE (809) 759-8000
TELECOPIER (809) 767-9333

WRITER'S DIRECT DIAL NO.

759-8000 ext. 2174

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JOSE A. CEPEDA-RODRIGUEZ
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ROBERTO MONTALVO
LUIS F. ANTONETTI
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LEONARDO ANDRADE-LUGO
JORGE L. MARTINEZ
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GREGORY T. USERA**
FRANCISCO A. BESOSA**
FRANCIS TORRES
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NOEL VERA-RAMIREZ
CARLOS RODRIGUEZ-CINTRO
MARTA FIGUEROA-TORRES
YOLANDA BENITEZ DE ALEGR
MERCEDES M. BARRERAS-SC
CARLOS MARTINEZ-VIVAS

* ALSO ADMITTED IN NEW YORK
** ALSO ADMITTED IN THE DISTRICT OF CO.

August 3, 1992

John K. Dema, Esq.
1236 Strand Street
Suite 103, Christiansted
St. Croix, USVI 00820-5008

RE: TEIC Drilling Near Splash and Dash, Inc.

Dear Jack:

Attached please find a duly executed agreement for the drilling to be performed by the TEIC near the Splash and Dash, Inc. operation, as part of the EPA investigation. Please note that the drilling time may exceed six days, however, as you mention, the conditions will be extended for the duration.

Thank you for your cooperation.

Regards,

José A. Cepeda Rodríguez

Attachment

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

JOHN K. DEMA

CAREY-ANNE MOODY

1230 STRAND STREET, SUITE 103, CHRISTIANSTED, ST. CROIX, USVI 00820-5008 • (809) 773-6142 • FAX: (809) 773-3944

31 July 1992

Via Facsimile Transmission
(809) 767-9177

Jose A. Cepedo, Esquire
Goldman Antonetti Ferraiuoli & Axtmayer
P. O. Box 70364
San Juan, Puerto Rico 00936-0364

RE: Shallow and Deep Well Drilling in the Vicinity of Splash & Dash, Inc.

Dear Attorney Cepedo:

Pursuant to our negotiations regarding the drilling in the vicinity of the Splash and Dash, Inc. car wash after it became clear that daytime drilling would significantly affect the operations of the car wash, we have come to the following agreement:

1. The drilling crew and/or any TEIC representatives of subcontractors shall not enter the area affecting the Splash & Dash, Inc. car wash until 7:30 p.m., thirty (30) minutes after the closure of the car wash business. They will have the entitlement to drill throughout the night provided that all equipment, barriers, vehicles, and any indications of their presence be eliminated from the affected property by 5:00 a.m. of the following morning. By 5:00 a.m. in the morning, the affected premises shall be broom-clean and free of any mud, dirt and debris, in addition to the previously-described equipment, vehicles and barriers.

2. These conditions will continue on a day-to-day basis until the drilling is terminated, which is now stated to be no longer than six (6) days.

3. If the time periods are violated in any respect, however minimal, the permission to drill will immediately be revoked until the sum of One Thousand Five Hundred Dollars ($1,500.00) is paid on a daily basis in advance for every day that the drilling continues until its termination.

Please have this agreement signed by Ana Gloria Ramos or any other properly authorized person(s) on behalf of the Tutu Environmental Investigation Committee and returned to us prior to the commencement of any operation within the affected area.

Very truly yours,

JKD/s

AGREED TO:

Ora Glenn Ross 8-3-92
TEIC Designated Coord. , Title

GOLDMAN ANTONETTI FERRAIUOLI & AXTMAYER

ATTORNEYS AND COUNSELORS AT LAW

POST OFFICE BOX 70364

SAN JUAN, PUERTO RICO 00936-0364

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MARTA FIGUEROA-TORRES
YOLANDA BENITEZ DE ALEGRIA
MERCEDES M. BARRERAS-SOLER
CARLOS MARTINEZ-VIVAS

* ALSO ADMITTED IN NEW YORK
** ALSO ADMITTED IN THE DISTRICT OF COLUMBIA

July 29, 1992

John K. Dema, Esq.
1236 Strand Street, Suite 103
St. Croix, USVI 00820-5008

Dear Jack:

Pursuant to your conversation with Ms. Ana Gloria Ramos, Coordinator for the TEIC, it is agreed that the drilling and related work to be performed at the Splash and Dash facility, will be performed after 7:00 p.m. It is also agreed that the equipment will be removed from the site each day before the opening of the car wash operations. I trust that we can now proceed with the work set forth in the EPA investigation.

Regards,

José A. Cepeda Rodríguez

c: Ms. A. G. Ramos

GOLDMAN ANTONETTI FERRAIUOLI & AXTMAYER
Attorneys and Counselors at Law

PO Box 70364
San Juan, Puerto Rico 00936-0364

American International Plaza
250 Muñoz Rivera Avenue, 14th Floor
Hato Rey, Puerto Rico 00918

AMERICAN INTERNATIONAL PLAZA OFFICES

☐ CENTRAL FAX (809) 767-9333

☑ Litigation and Administration (809) 767-9177

☐ Environmental (809) 767-9325 ☐ Labor (809) 767-8660

☐ Corporate (809) 767-8660 ☐ Taxes (809) 767-9325

This message is: ☑ URGENT. ☐ REGULAR.

Date: 7/14/92 Time: 2:30 PM

Please deliver the following page(s) to:

Name: Lcda Ana Gloria Lamas

Company Name: ESSO

Fax No. 782-1067 File No. 2052-003

From: E Colmenares Number of Pages: -10 -
(including cover letter)

Operator: Ext -3740

Additional Instructions: Vite Acuse de Recibo

Please call us immediately if there is any problem during this transmission at

(809) 759-8000 | Ext No. 3740.

SITE ACCESS AGREEMENT

1. The Tutu Environmental Investigation Committee (hereinafter "TEIC") is an unincorporated entity formed and funded by Esso Standard Oil Company and Texaco Caribbean, Inc. in order to undertake a comprehensive field investigation as mandated by the United States Environmental Protection Agency ("EPA") in coordination with the United States Virgin Islands Department of Planning and Natural Resources ("DPNR"), by order dated February 19, 1992 which includes a remedial and/or contamination work plan, community relations plan, remedial investigation and/or contamination investigation report, treatability study, development and screening of remedial alternatives, and feasibility study report. See Attachment "A".

2. Previously, on March 22, 1990, EPA issued an Administrative Order pursuant to the provisions of CERCLA Comprehensive Environmental Response Compensation and Liability Act ("CERCLA") and of the Resource Conservation and Recovery Act ("RCRA") mandating, among other things, the implementation of a ground water sampling program. This sampling process has been ongoing. TEIC has also been a participant on this endeavor.

3. FOUR WINDS Plaza Partnership, (hereinafter "FOUR WINDS") owns a shopping center located within the area being investigated.

4. Splash and Dash, Inc. (hereinafter "Splash and Dash")

operates a car wash at the shopping center owned by FOUR WINDS.

5. Geraghty & Miller, Inc., and Soil Tech, Inc, are the primary investigative contractors performing investigations, tests, monitorings and inspections on behalf of the TEIC pursuant to the investigative work plan approved by the EPA and DPNR. Such tests and investigations will involve, among others, the FOUR WINDS real property.

6. FOUR WINDS and Splash and Dash, Inc. hereby grant limited permission to the TEIC, Geraghty & Miller, Inc., Soil Tech, DPNR, EPA, its representatives and/or its contractors to conduct environmental sampling, monitoring and/or investigative activities at the FOUR WINDS property pursuant to the above referenced Administrative Order on Consent, its attached Work Plan and ground water sampling program provided that such sampling, monitoring and/or investigative activities are limited to and conducted in strict conformity with the attached Work Plan. Any deviations from such Work Plan affecting FOUR WINDS Real Property must have the express written permission from FOUR WINDS.

7. Prior to any proposed entry by the TEIC, Geraghty & Miller, Inc., Soil Tech, DPNR, EPA, its representatives and/or its contractors upon land belonging to FOUR WINDS, such proposing party shall give at least fifteen (15) days written notice to the FOUR WINDS. Notice will be understood to be complete upon

receipt which is to be confirmed delivery by fax or mail to the addresses listed herein:

1. FOUR WINDS Shopping Center
Management Offices
Estate Anna's Retreat
Charlotte Amalie, St. Thomas 00802

2. John K. Dema, PC
1236 Strand Street, Suite 103
Christiansted, St. Croix
U.S. Virgin Islands 00820-5008

The notice shall include the following:

(a) An inspection plan describing with particularity the complete scope of the particular segment of the work study plan being implemented; and a precise description of the purpose of such entry and inspection to be accomplished during the particular segment identified;

(b) The nature of the data expected to be obtained during the particular segment for which notice is given (e.g., the chemical composition of soil or ground water samples, the location of buildings, pipes or other structures, the taking of samples of soil, water or other tangible items);

(c) The name and address of the individual(s) or company proposed to conduct such inspection and entry;

(d) The nature and format of the raw data to be

collected;

(e) The date or dates upon which such inspection is proposed to be accomplished for the particular segment for which notice is being furnished;

(f) If the investigation will include activities/actions requiring a permit or authorisation from any Federal or Virgin Islands governmental entity, a copy of the application for such permit or authorisation should be included with the notice.

8. Such notice shall also contain a certification by the TEIC or its representatives of the execution of the hold harmless and indemnity agreement attached hereto as Attachment "B". The TEIC shall ensure that executed copies of such agreement are delivered to counsel for the party owning the land being inspected prior to commencement of any inspection.

9. The notice will be accompanied by a copy of a certificate of insurance, together with an opinion from the TEIC attorneys that such insurance will cover all obligations as set forth in the hold harmless and indemnification agreement referred to above.

TUT 003 1445

10. All activities at FOUR WINDS property will be conducted

in accordance with the provisions of EPA's Administrative Order, its Work Plan and any other requirements from such agency. Any modifications or deviations from the attached Work Plan affecting FOUR WINDS Real Property shall require the express written permission of FOUR WINDS.

11. TEIC shall execute the hold harmless and indemnity agreement made part hereof as Attachment "B".

12. All activities will be conducted at reasonable times and in a reasonable manner so as to ensure that the activities do not represent any environmental, safety, or health risk and do not interfere with the operations at the FOUR WINDS property. In the event of any interference which causes the permanent or temporary closure of the operations at the FOUR WINDS property, or at the Splash & Dash, Inc. facility, TEIC will immediately suspend such activity and seek to negotiate compensation for continued access.

13. All field activities conducted at the FOUR WINDS property will be done pursuant to the specification of the above mentioned work plan, following generally accepted principles of environmental engineering.

14. All activity on the FOUR WINDS or Splash and Dash property, will be conducted in accordance with all applicable federal and local laws and regulation.

15. TEIC legal representatives will provide to FOUR WINDS, within ten (10) days of issuance from Geraghty & Miller, Inc. or the TEIC the following documentation:

1. Technical Memorandum No. 1.

2. All EPA comments and criticisms to Technical Memorandum No. 1.

3. Any comments or criticisms from EPA and/or its Federal oversight contractor.

4. Any Revisions and final version of Technical Memorandum No. 1.

5. Technical Memorandum No. 2.

6. All EPA comments and criticisms to Technical Memorandum No. 2.

7. Any comments or criticisms from EPA and/or its Federal oversight contractor.

8. Any revisions and final versions of Technical Memorandum No. 2.

9. Any written recommendations regarding sampling and analytical procedures for the second ground water sampling event provided to the U.S. EPA for its approval.

10. Any and all monthly progress reports submitted to the U.S. EPA as required in the Consent Order.

11. Any significant deviations in the schedule.

12. All notification to the U.S. EPA of all sampling activities to be performed as a part of the investigation which is to be provided to the U.S. EPA at least ten (10) working days prior to the initiation of such activities.

13. All comments and criticisms received from the U.S. EPA, DPNR, or its oversight contractor regarding the investigation.

The documents to be submitted to FOUR WINDS include, without limitation, chromatography of analysis performed, copies of photographs, chemical analyses, photographs, radar imaging, magnetometer studies, as used or made part of the above mentioned documents. TEIC will make available the mylars and negatives from which photographs and maps and/or illustrations have been produced, or will reproduce the same upon request within fourteen (14) working days of the receipt of such request.

The TEIC agrees to assume the expense of producing such materials.

In the event of a designation by the EPA of a document as confidential or not subject to public review, the document production contemplated by this access agreement will be modified and limited by such designation. The submittal of this information in no way mean that FOUR WINDS will have a right to participate in the implementation of the Work Plan or any other actions undertaken pursuant to an EPA Order issued against or by the consent of Texaco or Esso. The submittal of this information shall neither create nor abrogate any rights of comment of FOUR WINDS in the implementation of the Work Plan or any other part of the investigation.

16. The request for entry shall be made giving full consideration for the fact that FOUR WINDS, the party owning the

Insert A

it is expressly agreed that the submittal of this information shall not abrogate any rights of FOUR WINDS to discovery pursuant to the Federal Rules of Civil Procedure of the investigative activities and results of such investigation conducted by Garaghty & Miller, Inc. and Soil Tech, Inc. or their subcontractors

OK

land being inspected, shall be fully entitled to have its representatives on site at all times during such inspection. In ordinary circumstances, such requested entry will not be held on Saturday, Sunday of legal holidays applicable in the United States Virgin Islands.

17. Upon request from the representatives of the party owning the land being inspected, and if technically feasible, a split will be provided of any sampling taken from the FOUR WINDS property.

On this 14th day of July 1992,

Law Offices of
John K. Dema, P.C.

By: _____
Attorneys for FOUR WINDS
Plaza Partnership
and
Splash and Dash, Inc.

Tutu Environmental
Investigation Committee

By: Ana Gloria Ramos
Eng. Ana Gloria Ramos
Designated Coordinator

EXHIBIT "B"

HOLD-HARMLESS AND INDEMNITY AGREEMENT

The TUTU ENVIRONMENTAL INVESTIGATION COMMITTEE, hereinafter "TEIC" agrees to indemnify, defend, reimburse and hold-harmless Four Winds Plaza Partnership and Splash and Dash, Inc., and any of its parent or related companies, affiliates or subsidiaries, its employees, agents, officers or shareholders, hereinafter the "OWNERS", from any and all damages, injuries and liability, including but not limited to, claims, damages, complaints or causes of action arising out of the actions of the TEIC and/or its consultants, during the investigation to be conducted by such entities at the OWNER'S property.

This obligation shall include, but not be limited to, the burden and expense of defending all claims, suits and administrative proceedings, even if such claims, suits or proceedings are groundless, false or fraudulent, and conducting all negotiations of any descriptions, and paying and discharging, when and as the same become due, and all judgements, penalties or other sums due against such indemnified persons.

IN WITNESS WHEREOF, the parties execute the foregoing Hold-Harmless and Indemnity Agreement in _____, this _____ day of June, 1992.

TUTU ENVIRONMENTAL
INVESTIGATION COMMITTEE

By: _____

TUT 003 1450

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 10, 1992

Eng. Caroline Kwan
Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
US Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

RE: Tutu Well Site
Administrative Order on Consent
Index No. II-RCRA-Proceeding
7003 and 9003-92-0401
Monthly Progress Report No. 7

Dear Mrs. Kwan:

Attached find the Written Monthly Progress Report for the subject Administrative Order.

If you have any question regarding this matter, please contact the undersigned at (809) 749-8943.

Very truly yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

AGR/mpt/EPAKWAN

Attachments

pc: Mr. J. Juanet
Mr. D. Lee
Scott McCay, Esq. - Texaco
Mr. L. Ruiz - Texaco
José A. Cepeda/Francis Torres, Esqs.
Mr. José Font - EPA Caribbean Field Office
Mr. Roy E. Adams - Commissioner DPNR-USVI
Mr. Leonard Reed/ Benjamin Nazario - DPNR
Mr. J. C. Agrelot - Soil Tech
Mr. T. Danahy - Geraghty & Miller

TUT 003 1451

Telephone: (809) 792-2920 Fax. (809) 793-6555

MONTHLY PROGRESS REPORT NO. 7
September 10, 1992

RE: Administrative Order on Consent
Index No. II - RCRA - Proceeding
7003 & 9003-92-0401

WORK COMPLETED DURING THE MONTH

This report includes work performed during the period of August 1 through August 31, 1992.

1. Drilling field work continued in August. As of August 31, 1992, 18 monitoring wells have been completed, including MW-2, MW-5, MW-6, MW6D, MW-10, MW-10D.

2. Three additional Soil Borings B-14 through B-16 were completed along the north of the Curriculum Center Building (Former LAGA Building) as described in Geraghty & Miller's letter to the USEPA dated August 14, 1992. Soil samples were collected for laboratory analysis from these borings.

3. The abandonment of Monitoring Well MW-6 was started in accordance with the procedures outlined in the August 26, 1992 letter from Geraghty & Miller to the U.S. Environmental Protection Agency (USEPA). The stainless steel casing was removed and the borehole for MW-6 was re-drilled to the original depth of 65 feet and sealed using a bentonite cement grout.

4. Installation of the temporary treatment system for the pumping test has been completed.

5. All soil borings were completed. Soil samples from the soil borings have been analyzed using the field gas chromatograph. Based upon photo ionization detector (i.e., HNU) results, soil samples have been collected and shipped for laboratory analysis in accordance with the work plan.

6. A description of the surface soil sampling locations was submitted via facsimile to the USEPA on August 18, 1992.

7. Surface soil samples SS-1 through SS-9 were collected.

8. Well development was initiated. All monitoring wells, except MW-6R and MW-9S have been developed.

9. Revision to Appendix C submitted to USEPA on August 17, 1992.

10. Anticipated schedule for August thru November 1992 submitted to USEPA on August 21, 1992.

11. Public Work Temporary Discharge Permit received on August 14, 1992. This covers for the Discharge of Ground Water into the sanitary service after treatment.

PROBLEMS ENCOUNTERED

Monitoring Well MW-9 was installed with a screened interval from 14 feet to 34 feet below ground surface (bgs). Long-term static water levels of approximately 13 fee bgs indicate that this well is not screening the water table. Therefore, an additional Monitoring Well MW-9S will be installed with a screened interval from 9 feet to 29 feet bgs. Monitoring Well MW-9S will be located within a 5-foot radius of Monitoring Well MW-9.

WORK TO BE COMPLETED DURING NEXT MONTH

The work to be completed by September 30, 1992 is summarized below:

1. Finish well abandonment at Monitoring Well MW-6
2. Continued drilling activities at Monitoring Well MW-6R.
3. Installation of Monitoring Well MW-9S.
4. Development of Monitoring Wells MW-6R and MW-9S.
5. Treatment and discharge of the well development water.
6. Water level measurements after development will be collected. The monitoring wells will be allowed to equilibrate until the first round of ground-water sampling is performed beginning on September 28, 1992. A complete round of water levels measurements will be collected in all monitoring wells on September 28, prior to beginning ground-water sampling.

Ana Gloria Ramos

ANA GLORIA RAMOS

GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES
CHARLOTTE AMALIE, ST. THOMAS, V. I.
NO. 8 SUB-BASE
PUBLIC WORKS DEPARTMENT

FAX 809-774-5869
or
FAX 809-776-8990

DIVISION Utilities

MEMORANDUM

TO: Honorable Leo H. Francis
Commissioner

FROM: THE REVIEW COMMITTEE (PWD):

Mr. Gilbert Estrill
Director of Utilities

Mr. Leal VanBeverhoudt
Deputy Commissioner, Operations

Mr. Tyrone Martin
Senior Planner

DATE: 8/14/92

RE: SEWER CONNECTION

NAME OF OWNER: Justin Environmental Investigation Committee

ADDRESS: 4 Winds Plaza, Esso Station Route 38

The Review Committee has reviewed the above referenced application and the following is our recommendation:

APPROVAL ✓ DISAPPROVAL _____

REMARKS: Temporary Permit for Sewer Installation / As agreed to: See attached:

Signature _____
Commissioner, PWD

TUT 003 1455

GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES

ENGINEERING
PUBLIC WORKS DEPARTMENT
Estate Anna's Hope
Christiansted, St. Croix, V.I. 00820

TEMPORARY

DISCHARGE PERMIT

Permit number T 000001- 92

Expires JANUARY 1993

Permission is granted to GERAGHTY AND MILLER ENVIRONMENTAL SERVICES **for the discharge of** 45,000 **gallons of waste into the sanitary sewers of the island of** ST. THOMAS.

Specific conditions and/or properties of the waste are as follows:

1- THE DEPARTMENT OF PUBLIC WORKS

A- Shall have notice of discharge at least 48 hours prior to said discharge

B- Shall receive all pertinent laboratory analysis in a timely manner

C- Will receive a temporary connection permit approved by the Director of Utilities.

2- The discharge shall meet federal drinking water standards as established by the EPA for all volitile organic compounds (VOC)

Authorized by:

Gilbert Estrill
Director of Utilities

Date 4/21/92

and

May Adams Cornwall
Director of Environmental Engineering

Date 4/15/92

TUT 003 1456

FROM : PHONE NO. : P02

GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES

ENGINEERING
PUBLIC WORKS DEPARTMENT
Estate Anna's Hope
Christiansted, St. Croix, V.I. 00820

MAY 6,1992

Thomas V. Danahy
Project Manager
Geraghty & Miller,Inc.
Environmental Services
201 West Passaic Street,3rd Floor
Rochell Park, New Jersey,07662

Re: Request for Temporary Authorization of Ground-Water Discharge to Sanitary Sewer in the Tutu Area, St. Thomas, USVI

Dear Mr. Danahy

Transmitted within is Temporary Discharge Permit #001-92 which expires January,1993. The permit states the specific conditions that are necessary for an environmentally sound discharge of the waste stream generated from the ground-water clean up in the Tutu area into our collection system.

The permit is conditioned that prior to discharge a temporary connection permit is attained from our utilities director.The effluent is required to meet at a minimum the federal drinking water guidelines and standards as established by the EPA for volatile organic compounds (VOC).

The Dept. of Public Works requires that timely notification of the discharge is given and that the pertinent levels are attained in the effluent prior to discharge.

Should you need further clarification on the conditions of the permit, please contact Mr. Mirko M. Restovic, at 809-773-6639.

We hope our assistance in this endeavor will expedite the clean up of the ground-water in the Tutu area aquifer.

Respectfully,

Leo R. Francis
Commissioner

cc: May Cornwall
Mirko M. Restovic

GOVERNMENT OF THE VIRGIN ISLANDS

DEPARTMENT OF PLANNING AND NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL PROTECTION

IN THE MATTER OF THE DEPARTMENT OF PLANNING AND NATURAL RESOURCES, ROY E. ADAMS, COMMISSIONER COMPLAINANT, vs. THOMAS GASSETT, INDIVIDUALLY AND THOMAS GASSETT D/B/A GASSETT AUTO MALL, ST. THOMAS, VIRGIN ISLANDS, RESPONDENT.	ORDER TEIC 01-92

I. AUTHORITY

Pursuant to 12 V.I.C.-Sec. 188 (d); and 12 V.I.C. Sec. 189, the Commissioner has the authority to declare that a pollution source or combination of sources are presenting an imminent and substantial danger to the health and welfare of the public; and may order the inspection and entry onto land within the Territory to carry out the purposes of the Water Pollution Control Act.

II. FINDINGS OF FACT

A. Since July, 1987, the Department of Planning and Natural Resources (DPNR) and the United States Environmental Protection Agency (EPA) have been involved in the sampling and testing of identified water wells in the Tutu section of Anna's Retreat within the Tutu Water/Turpentine Run Aquifer. This testing has taken place because contaminants were found in both wells and cisterns within this area.

B. In order to protect the public health and welfare, DPNR ordered the closing of a number of commercial and residential wells within the affected area.

C. In February, 1992 the EPA entered into an Administrative Order of Consent with Esso Standard Oil S.A., Limited and Texaco Caribbean, Inc., to determine the vertical and horizontal nature and extent of soil and ground water contamination; and the rate and direction of contamination movement.

D. In order to implement this Administrative Order of Consent, to carry out the purposes of the Water Pollution Control Act and to protect the health and welfare of the public from what is considered to be an an imminent health hazard, it is necessary for representatives of DPNR, EPA, Esso Standard Oil S.A., Limited and Texaco Caribbean, Inc., to enter on and test the soil and water on land which is leased and occupied by Gassett Auto Mall.

E. All prior orders of both DPNR and EPA are hereby relied upon and incorporated by reference.

ORDER

In consideration of the foregoing, Thomas Gassett, individually and Thomas Gassett d/b/a Gassett Auto Mall, his agents, representatives and employees are hereby ORDERED to permit DPNR, EPA, Esso Standard Oil S.A., Limited and Texaco Caribbean, Inc., its agents and representatives to enter upon its land for the purpose of conducting soil and water sampling.

Failure to comply with this ORDER subjects Thomas Gassett, individually and Thomas Gassett d/b/a Gassett Auto Mall to Civil penalties pursuant to the Virgin Islands Code.

SO ORDERED this 23rd day of July, 1992.

Roy E. Adams, Commissioner

If you have any questions, please contact Leonard Reed, Assistant Director, Division of Environmental Protection at 809-774-3320.

Receipt of the within Order is hereby acknowledged.

8/3/92
(Date)

(Received By)

Served Upon _____

by Sr. L.A. Jackson, 3 Aug. 92.
(date)

REA/LHS/eeh

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

August 14, 1992

Ms. Caroline Kwan
U.S. Environmental Protection Agency
26 Federal Plaza, Room 737
New York, New York 10278

Re: Proposed Soil Borings B-14 through B-16 Tutu Service Station Investigation
St. Thomas, U.S. Virgin Islands.

Dear Ms. Kwan:

At the request of Ms. Ana Gloria Ramos, Designated Coordinator for the Tutu Environmental Investigation Committee (TEIC), Geraghty & Miller, Inc. would like to perform three additional soil borings (designated B-14, B-15, and B-16) at the Curriculum Center Building (former LAGA Building). Based upon information developed by TEIC, a metal pipe which extends through the north wall of the building (see Figure 1) may have been a source of tetrachloroethene (PCE) discharge.

The three soil borings will be advanced using hollow-stem augers until refusal. Continuous split-spoon samples will be taken at each boring. Each split-spoon will be screened using a HNu photoionization instrument. The sample with the highest HNu reading or visible staining will be selected for laboratory analysis. If no elevated HNu readings are encountered, the soil interval 0 to 6 inches above the bedrock surface or water table (whichever is encountered first) will be selected for laboratory analysis. Each split-spoon soil sample will be sampled for field gas chromatograph analysis.

The sampling methodology outlined above and all other associated procedures will be performed in accordance with the project work plan. Because the foundation outlined in Figure

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 • FAX (201) 909-0567/0568

2 is under construction, it is important that these borings be completed while the area is still accessible. Based upon our recent telephone conversation, it is our understanding that you do not have any objections to these additional borings.

Please call if you have any questions.

Sincerely,

GERAGHTY & MILLER. INC.

Thomas V. Danahy/mdr

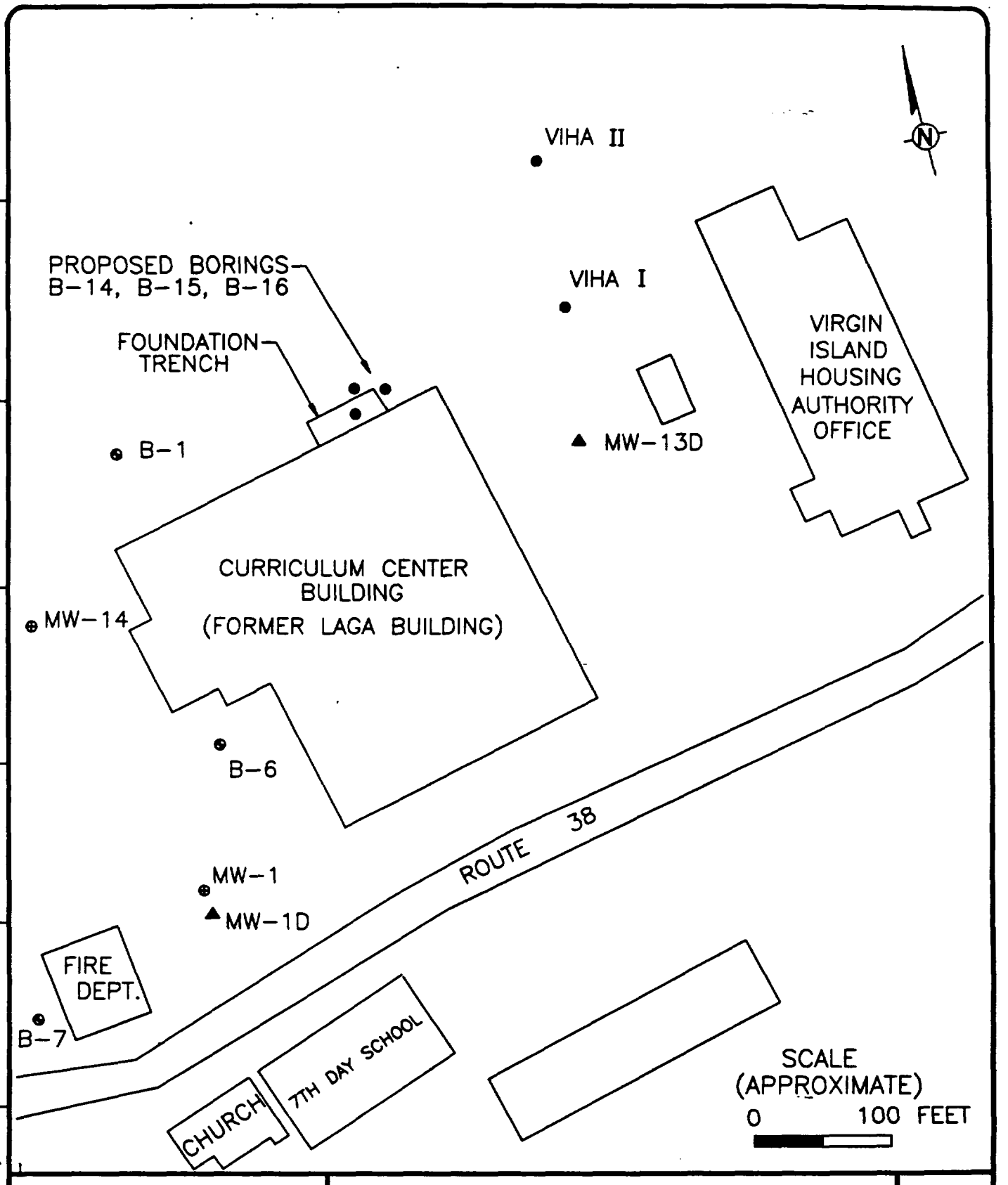
Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman (cce)

Daniel A. Nachman
Vice President/Project Director

c: Ana Gloria Ramos, TEIC
Sarah K. Odland, CDM Federal Programs

TVD:jmh
PR013.01-3/081492.ltr



DWG DATE: 8/14/92 | PRJCT NO.: PR01301 | FILE NO.: TU-64 | DRAWING: TU-64 | CHECKED: REIVE | APPROVED: DANAHY | DRAFTER: NIXON

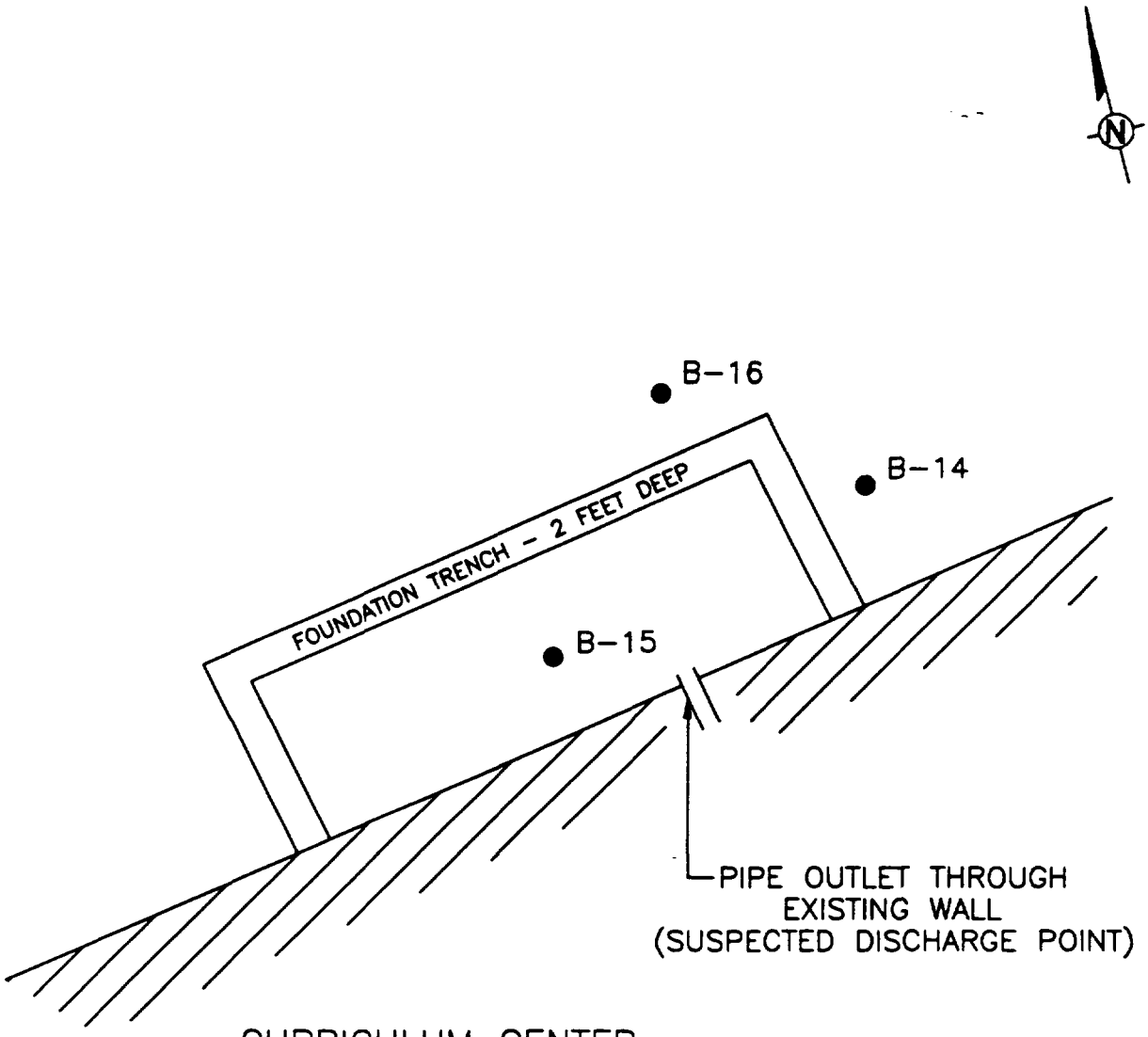
GERAGHTY & MILLER, INC.
Environmental Services

GENERAL LOCATION OF PROPOSED SOIL BORINGS B-14 THROUGH B-16

TUTU SERVICE STATION INVESTIGATION
ST. THOMAS, U.S. VIRGIN ISLANDS

FIGURE
1

DRAFTER: NIXON | APPROVED: DANAHY | CHECKED: REIVE | DRAWING: TU-65 | FILE NO.: TU-65 | PRJCT NO.: PR01301 | DWG DATE: 8/14/92



GERAGHTY & MILLER, INC.
Environmental Services

DETAIL OF PROPOSED SOIL BORING LOCATIONS B-14, B-15, AND B-16

TUTU SERVICE STATION INVESTIGATION
ST. THOMAS, U.S. VIRGIN ISLANDS

FIGURE
2

GERAGHTY & MILLER, INC.
201 W. Passaic Street, 3rd Floor
Rochelle Park, NJ 07662
Main Number (201-909-0700)
Telecopier Numbers (201-909-0567 & 0568)

TO: ANA GLORIA RAMOS
FAX#: (809) 782-5067
FROM: THOMAS V. DANAHY
DATE: 8-18-92
PROJECT # PRO13.01 Tutu, St. Thomas

DOCUMENT CONSISTS OF 13 **PAGE(S) (INCLUDING THIS PAGE).** (If you do not receive all the pages indicated, please call our operator at 201-909-0700).

DESCRIPTION: Surface Soil & Sludge Sampling

MEMO/COMMENTS:

SENT BY: TVD

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

August 18, 1992

Caroline Kwan
U.S. Environmental Protection Agency
26 Federal Plaza Room 737
New York, New York 10278

RE: Proposed Surface Soil and Sludge Sampling Locations, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands

Dear Ms. Kwan:

Based on our recent discussion, the Tutu Environmental Investigation Committee (TEIC) has incorporated the U.S. Environmental Protection Agency's (USEPA'a) recommendations into the proposed soil sampling program. The proposed surface soil sample locations and analytical parameters are outlined in Table 1. If possible, two sludge samples from drums at the Curriculum Center (former LAGA Building) will be collected, as proposed in Technical Memorandum No. 1. The analytical parameters for these sludges are listed in Table 2.

Blind field replicates for surface soil (SS-7) and sludge (SL-2) will also be collected. Sampling procedures will be in accordance with the standard procedures provided by CDM Federal Programs, which are attached.

TUT 003 1465

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 • FAX (201) 909-0567/0568

If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman
Vice President/Project Director

TVD/DAN:llc
Enclosures

c: Ana Gloria Ramos, TEIC

#PR013.01-WP3/081892.ltr

Table 1. Proposed Surface Soil Samples, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Surface Soil Sample No.	Location	Analytical Parameters
SS-1 SS-2	Northeast Corner of Curriculum Center Property	TAL Metals
SS-3 and SS-4	Stained Soils in Drum Disposal Area at Curriculum Center	TCL VOCs TCL Semi-Volatiles TAL Metals
SS-5	Tillett Property	TCL VOCs TCL Semi-Volatiles TAL Metals
SS-6 and SS-7	O'Henry Property	TCL VOCs TCL Semi-Volatiles TAL Metals

SS-7 will be a blind field replicate of SS-6.
TCL Target Compound List.
VOCs Volatile Organic Compounds.
TAL Target Analyte List.
All analyses will be performed according to Contract Laboratory Program (CLP) protocols.

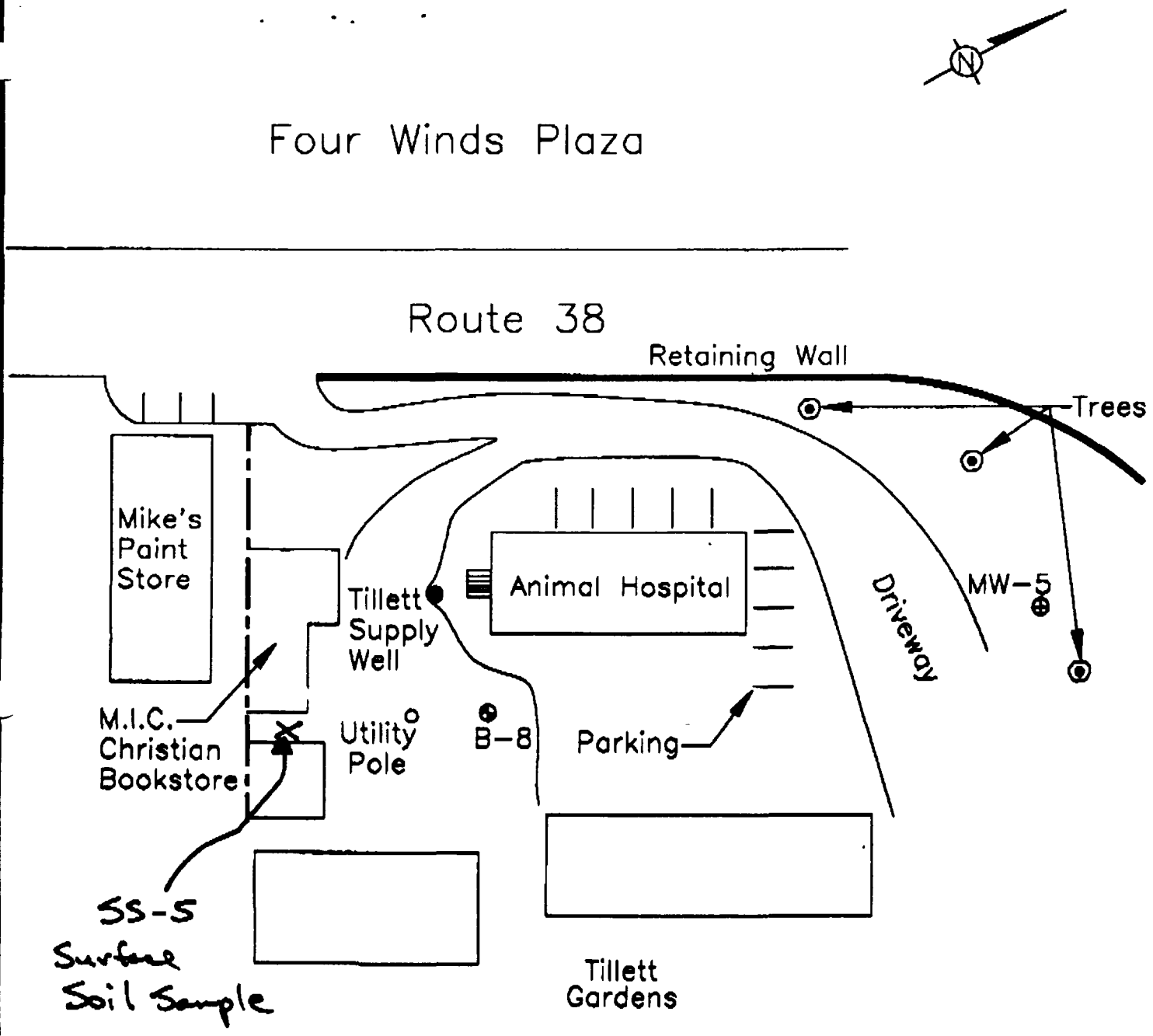
#PR013.01-WP3/samples.tbl

Table 2. Proposed Sludge Samples, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Sludge Sample No.	Location	Analytical Parameters
SL-1, SL-2, and SL-3	Sludge in Drums at Curriculum Center	TCL VOCs TCL Semi-Volatiles TAL Metals

SL-2 will be a blind field replicate of SL-1.
TCL Target Compound List.
VOCs Volatile Organic Compounds.
TAL Target Analyte List.
All analyses will be performed according to Contract Laboratory Program (CLP) protocols.

#PR013.01-WP3/samples.tbl



DRAFTER: [illegible]ON | APPROVED: DANAHY | CHECKED: MOFFATT | DRAWING: TU-27 | FILE NO.: - | PROJECT NO.: PR0130M | DWG DATE: 15JUL92

GERAGHTY & MILLER, INC.
Environmental Services

PROPOSED DRILLING LOCATIONS
TILLETT PROPERTY
TUTU, ST. THOMAS
U.S. VIRGIN ISLANDS

TUT 003 1469

FIGURE

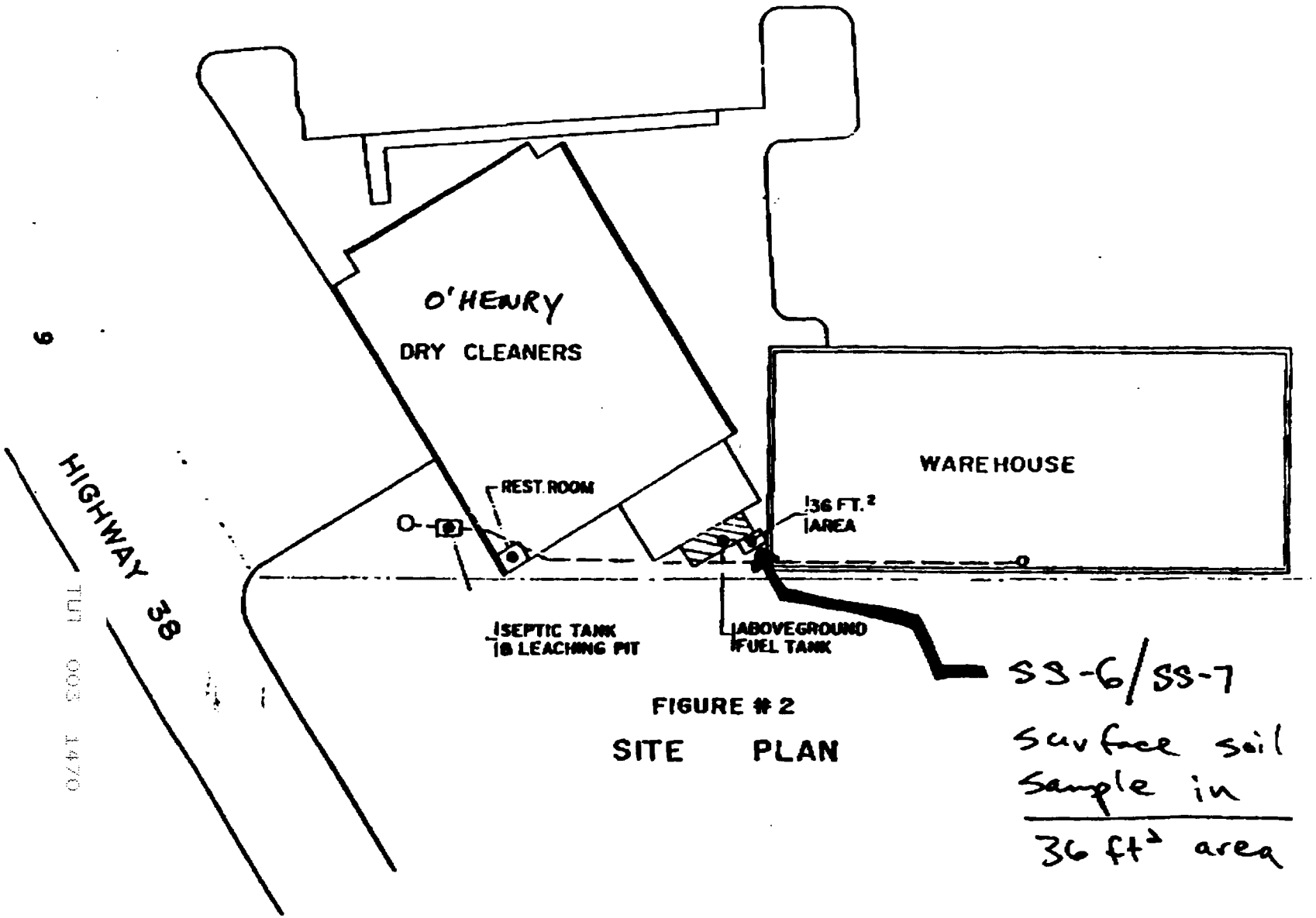


FIGURE # 2

SITE PLAN

CDM FEDERAL PROGRAMS CORPORATION
111 Fulton Street - Suite 710
New York. New York 10038
Telephone Number: (212) 393-9634
FAX NUMBER: (212) 267-3097

Date: 8/18/92

Job No.: 7253-048-CR1-10R(

Work Group No.: _____

TO: Tom Danahy
Geraghty & Miller

_____

FAX NUMBER: 201/909-0567

FROM: Sally Odland

Number of pages transmitted including this sheet is 6.

Caroline Kwan + I tried to reach you, but you were in a meeting. With the B-90 rig down and a tropical storm on the way, we would like to collect the surface soil samples today at Tutu.

Attached is an acceptable method for sampling surface soils. Caroline had not received your protocols yet and we don't want that to stand in the way of sampling.

If you have any problems with this fax please call. Sally **at (212) 393-963**

(Mitzi - 26)

TUT 003 1471

4.0 REQUIRED EQUIPMENT

- Site-specific plans
- Field logbook
- Indelible black ink pens and markers
- Labels and appropriate forms/documentation for sample shipment
- Appropriate sample containers
- Insulated cooler and waterproof sealing tape
- Ice bags or "blue ice"
- Latex or appropriate gloves
- Plastic zip-top bags
- Personal protective clothing and gear
- Stainless steel and/or Teflon-lined spatulas and pans, trays, or bowls
- Stainless steel and/or Teflon-lined trowels or spoons (or equipment as specified in the site-specific plans)
- Plastic sheeting

5.0 PROCEDURES

5.1 Preparation

The following steps must be followed when preparing for sample collection:

1. Don the appropriate personal protective clothing as dictated by the site-specific health and safety plan.

2. The collection points shall be staked, located on a site map, and referenced in the field logbook.

3. Processes for verifying depth of sampling must be specified in the site-specific plans.

4. Place clean plastic sheeting on a flat, level surface near the sampling area, if possible, and place equipment to be used on the plastic; place the insulated cooler(s) on separate plastic sheeting. Cover all equipment and supplies with clean plastic sheeting when not in use.

5. A clean, decontaminated trowel or spoon will be used for each sample collected.

5.2 Collection

The following general steps must be followed when collecting surface soil samples:

1. Surface soil samples are normally collected from the least-contaminated to the most-contaminated areas. Stay outside of a specific sampling location until all samples are collected at that location.

2. Document the sampling events, recording the information in the designated field logbook. Document any and all deviations from SOPs in the field logbook and include rationale for changes. ~~See FPC SOP 4-1.~~

3. Carefully remove stones, vegetation, snow, etc. from the sampling location surface.

4. Carefully remove the top 1 to 2 cm of exposed soil, sediment, or sludge before sample collection.

5. Collect sample portions or aliquots for volatile analyses first and any other samples that would be degraded by aeration.

5.2.1 Method for Collecting Samples for Volatile Organic Compound (VOC) Analysis

The requirements for collecting grab samples of surface soil for VOCs or other samples degraded by aeration are as follows:

1. VOC samples shall be collected with the least disturbance possible.

2. VOC samples shall be collected as grab samples; however, the method of collection will vary from site to site, based on data quality objectives and the degree of known or suspected contamination.

3. Label the sample containers with the appropriate information. Secure the label, covering it with a piece of clear tape.

4. Use a clean stainless steel or Teflon-lined trowel or spoon (or tube) to collect sufficient material in one grab, over the required sampling interval, to fill the sample containers.

5. With the aid of a clean stainless steel spatula, quickly fill the sample containers directly from the sampling device, removing stones, twigs, grass, etc., from the sample. Fill the containers as full and compact as possible to minimize head space.

6. Immediately secure the Teflon-lined caps on the sample container.

7. Wipe the containers clean with a clean Kimwipe or paper towel.

8. Place the containers in individual zip-top plastic bag(s) and seal the bag(s).

9. Pack all samples according to FPC SOP 2-5. Include properly completed Traffic Reports and/or chain-of-custody forms, and affix signed and dated custody seals to the three unhinged sides of the cooler lid.

10. Decontaminate sampling equipment according to ~~FPC SOP 4-5~~ Work Plan.

5.2.2 Method for Collecting Samples for Nonvolatile Organic or Inorganic Compound Analysis

The requirements for collecting samples of surface soil for non-volatile organic or inorganic analyses are as follows:

1. Label each sample container with the appropriate information. Secure the label by covering it with a piece of clear tape.

2. Use a decontaminated stainless steel or Teflon-lined trowel or spoon to obtain sufficient sample from the required interval and subsampling points, if necessary, to fill the specified sample containers.

3. Empty the contents of each fill of the sampling device directly into a clean stainless steel or Teflon-lined tray or bowl.

4. ~~Composite~~ Homogenize sample according to ~~FPC SOP 2-3~~ attached method described in the EPA Region II CERCLA QA Manual, page 57, under "Homogenization."

5. Use the spoon, spatula, or trowel to distribute the uniform mixture into the labeled sample containers. Fill organic sample containers first, then inorganics.

6. Secure the appropriate cap on each container immediately after filling it.

7. Wipe the sample containers clean with a clean Kimwipe or paper towel.

8. Place sample containers in individual zip-top plastic bags and seal the bags.

9. Pack all samples according to FPC SOP 2-5. Include properly completed Traffic Report and/or chain-of-custody forms, and affix custody seals to the three unhinged sides of the cooler lid.

10. Decontaminate sampling equipment according to ~~FPC SOP 4-5.~~ Work Plan

6.0 RESTRICTIONS/LIMITATIONS

Grab sampling for VOC analysis or for analysis of any other compound(s) that may be degraded by aeration is necessary to minimize sample disturbance and, hence, analyte loss. The representativeness of this sample, however, is difficult to determine because the collected sample represents a single point, is not homogenized, and has been disturbed.

7.0 REFERENCES

U.S. Department of Energy, Hazardous Waste Remedial Actions Program, *Quality Control Requirements For Field Methods*, DOE/HWP-69/R1, July 1990.

U.S. Department of Energy, Hazardous Waste Remedial Actions Program, *Standard Operating Procedures For Site Characterizations*, DOE/HWP-100, July 1990.

U.S. Environmental Protection Agency, *A Compendium of Superfund Field Operations Methods*, EPA/540/P-87/001, OSWER Directive 9355.0-14, December 1987.

IX. METHODS OF SAMPLE PREPARATION

A. Homogenization

The homogenization of a sample is the process of mixing individual grab samples in order to minimize any bias of sample representativeness introduced by the natural stratification of constituents within the sample.

To homogenize a sample of a soil/sediment matrix, first rocks, twigs, leaves and other debris should be removed if they are not considered part of the sample. The soil/sediment should be removed from the sampling device and placed in a stainless steel pan, then thoroughly mixed using a stainless steel spoon. The sediment in the pan should be scraped from the sides, corners and bottom of the pan, rolled to the middle of the pan, and initially mixed. The sample should then be quartered and moved to the four corners of the pan. Each quarter of the sample should be mixed individually, and then rolled to the center of the container and the entire sample mixed again.

Homogenization of an aqueous sample is only necessary if stratification of constituents is of concern, for example when sampling a lagoon or containerized liquid. Then homogenization would be performed by mixing in a stainless steel bowl.

B. Compositing

Compositing of samples is performed when samplers desire to obtain an average concentration of contaminants over a certain number of sampling points. Anytime compositing is performed, the concentration of contaminant in individual grab samples is diluted proportionately to the number of samples taken. Not only is the contaminant diluted, the detection limits for each individual sample are raised proportionally to the number of samples added to the composite. For instance, if a sampler wishes to composite two discreet samples into one, and the method detection limit for a target compound is 330 ppb, the detection limit for the target compound does not change for the composite, however, the detection limit for the compound in the individual samples which make up the composite is two times the normal detection limit or 2 * 330 = 660 ppb. This is important to keep in mind because it is possible that if a contaminant were present in only one of the two composited samples, and if it were at a level between 330 and 660 ppb, that contaminant would not be quantified or possibly even identified due to the effective dilution of the contaminant concentration in the composite. This concept should be taken into account when determining the data quality objectives of a composite sampling event, to ensure that useful data is collected. It is advisable that if a positive identification is made in the course of analyzing a composite sample, that the discreet samples then be analyzed individually to determine the true distribution of contaminant throughout each component of the composite.

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

August 17, 1992

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

Re: Revision of Appendix C, Tutu Service Station Investigation Work Plan,
St. Thomas, U.S. Virgin Islands

Dear Ms. Kwan:

As discussed in a previous telephone conversation between Caroline Kwan, U.S. Environmental Protection Agency (USEPA), and Thomas V. Danahy, Geraghty & Miller, Inc., the field gas chromatograph (GC) in use for the Tutu Service Station Investigation consists of a Photovac 10S-Plus. Details regarding the change of the instrument originally specified in the Geraghty & Miller Tutu Service Station Investigation Work Plan, St. Thomas, U.S. Virgin Islands (March 1992), are discussed below.

The Photovac 10S-Plus is an up-graded version of the Photovac 10S-50 and Photovac 10S-70. The lamp, detector, and hardware components of the GC remain unchanged, except for the replacement of the Teflon valves with stainless steel valves, which reduces the occurrence of peak cross-contamination.

The microprocessor-controlled Photovac 10S-Plus with state-of-the-art computer software displays run-time chromotograms on a liquid crystal display (LCD), can download files to an external printer, and has the capability of saving approximately 12 data files per diskette with the disk drive. In addition, the improved computerized software allows three-point calibration curves to be constructed for each analyte allowing more accurate quantitation, compared to the conventional one-point calibration method.

Appendix C of the Work Plan has been revised and updated appropriately for the Photovac 10S-Plus GC. The revised Appendix C is enclosed for your review. Bingham Environmental Inc. of Tampa, Florida is providing field GC operation services.

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 • FAX (201) 909-0567/0568

If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Michael D. Reive

Michael D. Reive
Scientist

Thomas V. Danahy

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel Nachman
Vice President/Project Director

MDR:rma:kj

Enclosure - Revision of Appendix C

c: Sarah K. Odland, CDM Federal Programs Corp.
Ana Gloria Ramos, TEIC
Daniel Bingham, Bingham Environmental, Inc.
Jose Agrelot, Soil Tech

#PR01301d-3/081792.ltr

REVISION TO APPENDIX C
TUTU SERVICE STATION INVESTIGATION
WORK PLAN
ST. THOMAS, U.S. VIRGIN ISLANDS

PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT

Revision to Appendix C
August 1992

Prepared for

Tutu Environmental Investigation Committee
San Juan, Puerto Rico

Prepared by

Geraghty & Miller, Inc.
Environmental Services
201 West Passaic Street
Rochelle Park, New Jersey 07662
(201) 909-0700

APPENDIX C

FIELD GAS CHROMATOGRAPH ANALYSIS AND CALIBRATION PROCEDURES

All of the soil samples obtained during drilling will be analyzed for volatile organic compounds (VOCs) using a field gas chromatograph (GC). Water samples from the monitoring wells may also be analyzed for VOCs using the field GC, in order to provide a preliminary evaluation of ground-water quality.

1.0 SAMPLING AND ANALYSIS

1.1 Soil samples to be analyzed using the field GC will be collected from the split-spoon using a stainless-steel trowel. Approximately 15 grams (g) of the soil sample will be placed in a 40 - milliliter (ml) VOC vial which contains 15 ml of organic-free distilled and deionized water making a one to two dilution. The sample will be shaken vigorously for 60 seconds. A 300-microliter (ul) headspace sample will be collected from the vial with a gas-tight syringe and injected into the GC.

1.2 Water samples to be analyzed using the field GC will be collected by pouring the water from the bailer directly into the 40-ml vial. The vial will be half-filled with water. The sample will be shaken vigorously for 60 seconds. A 300-ul headspace will be collected from the vial with a gas-tight syringe and injected into the GC.

1.3 The GC will identify all peak areas greater than 0.005 volt seconds (vs) as unknowns on the GC chromatogram.

1.4 The GC integrater will compare the retention time(s) of the unknowns with the most recent established calibration curve retention time window(s). If the retention times match, the compounds will be identified and quantified relative to the daily calibration curve stored within the GC reference library. The final concentration will

be reported in micrograms per kilogram (ug/kg) for soil and in micrograms per liter (ug/L) for water samples.

2.0 QUALITY ASSURANCE/QUALITY CONTROL

2.1 GC blank samples will be analyzed to ensure a steady baseline. A blank will be run by starting the GC without injecting a sample. Blanks will be run at the start of each day's sampling.

2.2 GC syringe blank samples will be analyzed to determine if there are carry-over effects from previous samples and standards. Syringe blanks will be analyzed following all samples where high VOC concentrations are detected. Contamination of the GC will be removed by purging the GC with ultra-zero air until the contamination is no longer detected. Contamination of the gas-tight syringe will be cleaned using methanol and organic-free water.

2.3 A duplicate GC sample will be run every ten samples to evaluate the precision of the analyses.

2.4 Approximately 10 percent of the samples analyzed by the field GC will have field replicates sent to the laboratory for analyses. These analyses will allow for a comparison between field GC and laboratory results. Those samples selected will include samples with both the highest and lowest GC results to confirm the presence and absence of VOC compounds.

3.0 CALIBRATION PROCEDURES

3.1 The GC will be calibrated with aqueous, mixed standards of the following compounds: benzene, toluene, ethylbenzene, m-xylene, o-xylene, tetrachloroethene (PCE), trichloroethene (TCE), and trans-1,2-dichloroethene (DCE).

3.2 The mixed calibration standards will be prepared in the concentration range expected to be present in the samples analyzed on-site (Table C-1). The mixed, stock standard will be prepared by introducing a known volume of the compounds from purchased individual 5,000 part per million (ppm) standards dissolved in methanol. Once the mixed, stock standard in methanol has been prepared, known volumes of the mixed stock standard will be introduced into organic-free water to prepare three concentration levels of aqueous calibration standards.

3.3 Fresh aqueous calibration standards will be prepared daily. These daily standards will be prepared from the mixed stock standard which will be kept refrigerated and prepared fresh at a minimum of once per week.

3.4 The GC will be calibrated at the beginning of each daily GC analysis event. Initial calibration will consist of establishing a three point calibration curve using the aqueous calibration standards, discussed previously in Sections 3.1 through 3.3.

3.5 Continuing calibration of the field GC will be maintained by the analysis of the aqueous, mid-point standard every 4 hours or more frequently, at the operator's discretion, in order to ensure accurate calibration of the instrument.

4.0 RECORD KEEPING

4.1 The Geraghty & Miller field hydrogeologist will maintain a list of samples collected for field GC analysis using the List for Field Gas Chromatograph Analyses (attached).

4.2 The field GC operator will maintain a list of all analyses performed (including blanks, standards, samples and duplicates) using the Field Gas Chromatograph Analytical Sheet (attached).

4.3 Chromatograms of field GC analysis will be attached in a bound notebook. The date and time of analysis, compounds identified, concentrations, sample volume and any other important instrument or interpretation notes will be recorded.

Table C–1. Calibration Standard Ranges for Site–Specific, Target Volatile Oragnic Compunds to be Analyzed by Field Gas Chromatography, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Parameter	Standard Level 1 (detection limit standard)	Standard Level 2 (mid–point standard)	Standard Level 3 (high standard)
Benzene	1	5	50
Ethylbenzene	3	15	150
trans–1,2–Dichloroethene	1	5	50
cis–1,2 Dichloroethene	2	10	100
Tetrachloroethene	2	10	100
Trichloroethene	1	5	50
Toluene	2	10	100
M,P–Xylene	3	15	150
O–Xylene	3	15	150

Concentration in parts per billion (ppb) or micrograms per kilogram (ug/kg).

PR01301–3/TableC1.wk3

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

August 21, 1992

Caroline Kwan
U.S. Environmental Agency
26 Federal Plaza
New York, New York 10278

Re: Anticipated Schedule for August through November 1992
Tutu Service Station Investigation
St. Thomas, U.S. Virgin Islands

Dear Ms. Kwan:

As we are nearing the completion of the drilling program for the above-referenced project, Geraghty & Miller, Inc. has projected the following schedule (see Table 1) for well development, ground-water sampling, and aquifer testing of the recently installed monitoring wells. This schedule is dependent upon development of all 18 monitoring wells by no later than September 21, 1992.

If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Thomas V. Danahy
~~Senior Scientist~~/Project Manager

Daniel A. Nachman
Vice President/Project Director

TVD:rma

Attachment

c: Ana Gloria Ramos, TEIC
Sally Odland, CDM Federal Programs
Laura Scalise, USEPA-MMB
Jose Agrelot, Soil Tech

PR01301/082192.ltr

TUT 003 1485

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 • FAX (201) 909-0567/0568

Table 1. Anticipated Schedule for August through November 1992, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date	Activity
August 24 – September 11	Finish monitoring well installation; including MW–2, MW–5, and MW–6R (replacement well); abandonment and sealing of MW–6.
August 24 – September 18	Development of 18 monitoring wells.
September 24 – October 2	Allow aquifer to stabilize – no site activity planned.
October 5	Collect synoptic round of water–levels at all monitoring wells.
October 5 – October 16	First ground–water sampling of all 18 monitoring wells.
October 16 – 21	Long–term ground–water level recording to check for possible influence from pumping wells.
October 21 – 23	Review long–term data.
October 26 – 28	Coordinate/prepare for pumping test.
Thursday, October 29	Set–up water–level recorders for pre–pumping trend.
Friday, October 30	4–hour step–test at MW–9 or MW–10; record recovery. Set–up recorder for pre–pumping trend for November 2 test.
Monday, November 2 @ 10:00 a.m.	Start 24–hour pump test at MW–9 or MW–10; pumping rate to be determined from the results of October 30 step–test.
Tuesday, November 3 @ 10:00 a.m.	End test; record recovery; data analysis.
Friday, November 6	4–hour step–test at MW–10D; record recovery. Set–up recorder for pre–pumping trend for November 9 pump test.
Monday, November 9 @ 10:00 a.m.	Start 24–hour pump test at MW–10D; pumping rate to be determined from November 6 step–test.
Tuesday, November 10 @ 10:00 a.m.	End test; record recovery.

#NJ01301/82192tbl.wk3.rms

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

September 1, 1992

Caroline Kwan
U.S. Environmental Protection Agency
26 Federal Plaza, Room 737
New York, New York 10278

Re: Abandonment of Monitoring Well MW-6
Tutu Service Station Investigation
St. Thomas, U.S. Virgin Islands

Dear Ms. Kwan:

As you know, Monitoring Well MW-6 was installed after incurring difficult drilling conditions in the 65-foot deep corehole at this location. (Please note the total depth was previously incorrectly stated to be 70 feet.) The coring was completed on July 23, 1992. This 3-inch diameter corehole was intended to preceed the reaming and installation of Monitoring Well MW-6D. However, as the corehole was being reamed to a diameter of 10 inches, formational collapse occurred.

Collapsed rock and soil filled the 10-inch diameter hole from approximately 25 to 35 feet below grade. In order to minimize re-drilling efforts, the field crew decided to set the shallow Monitoring Well MW-6 in the remaining drill hole rather than abandon the hole. Monitoring Well MW-6 consists of a flush-mounted 4-inch diameter stainless steel casing and screen. The screened interval is from 4 to 24 feet below grade.

As was agreed in a conference call between Caroline Kwan, USEPA; Sally Odland, CDM Federal Programs; and Thomas V. Danahy, Geraghty & Miller, Inc.; Monitoring MW-6

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 • FAX (201) 909-0567/0568

will be abandoned because the unsealed 65-foot deep corehole may result in anomalous water-level or water-quality data. The well abandonment and sealing procedures are outlined below.

The borehole will be reamed to the original depth using air-rotary and/or wash-rotary techniques. Initially, the drill crew will attempt to remove the 4-inch diameter stainless steel casing. If unsuccessful, the casing and screen will be left in place and the bottom of the 4-inch well will be drilled through to minimize further collapse of the formation. A 3-inch diameter rotary bit will be extended to 65 feet. Potable water will be used to cool the bit and remove cuttings. If necessary, bentonite mud may be used to remove cuttings from the hole. Upon reaching 65 feet, the corehole will be tremie-grouted to the surface by placing a bentonite-cement grout using the drill string or a tremie pipe. After grouting, the stainless steel casing will be cut-off at least 5 feet below grade (if it is not entirely removed). Clean backfill material will be placed in the upper 5 feet of the hole and the paving will be restored.

If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Thomas V. Danahy

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman/TVD

Daniel A. Nachman
Vice President/Project Director

c: Ana Gloria Ramos, TEIC
Sally Odland, CDM Federal Programs

TVD:cmw
PR01301-wp3/082592a.ltr

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Mr. Tom Gassett
214 Anna's Retreat
St. Thomas, , US Virgin Islands 00803

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Mr. Gassett:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

Received by Dick Knepp

TUT 003 1489

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

H.E. Lockhart Development
Lockhart Gardens
St. Thomas, Virgin Islands 00801

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Sirs:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

TUT 003 1490

Received by Richard Knoepfle

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

John Foster Real Estate
St. Thomas, US Virgin Islands 00802

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Sirs:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

TUT 003 1491

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

H.E. Lockhart Development
Lockhart Gardens
St. Thomas, Virgin Islands 00801

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Sirs:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

TUT 003 1492

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Rodriguez Auto Parts, Inc.
St. Thomas, Virgin Islands 00802

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Mr. Rodriguez:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

GR

TUT 003 1493

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Tillet
Total Vissions Tillet
PO Box 7549
St. Thomas, US Virgin Islands 00803

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Sirs
:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

RECEIVED L. Tillet SEPT. 4 '92

TUT 003 1494

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Ms. Rita Ramsay
PO Box 4250
St. Thomas, US Virgin Islands 00802

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Ms. Ramsay:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

Rec'd 9/4/92
R Ramsay

TUT 003 1495

Telephone: (809) 792-2920

Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Four Winds Plaza Partners
392 Anna's Retreat
St. Thomas, US Virgin Islands 00804

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Sirs:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

I have received the enclosed information 9/[illegible]

TUT 003 1496

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Ms. Cynthia Hodge
PO Box 1453
St. Thomas, US Virgin Islands 00804

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Ms. Hodge:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

TUT 003 1497

September 4, 1992 Cynthia Hodge

Telephone: (809) 792-2920 Fax. (809) 793-6555

SOIL TECH

WEEKLY MEETING REPORT - 9
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED	:	**August 31 to September 12, 1992**
ATTENDING	:	Ana Gloria Ramos, Designated Coordinator Clinton Moffatt, G&M José C. Agrelot, Soil Tech
PREPARED BY	:	José C. Agrelot, Soil Tech Project Coordinator
DATE PREPARED	:	October 13, 1992

FIELD WORK COMPLETED FROM AUGUST 31 TO SEPTEMBER 12, 1992

- Monitoring wells **MW-6** and **MW-6R** were completed during this period.
- The removal and grouting of **MW-6** was completed.
- Drums containing soil cuttings are being relocated from borehole or monitoring well locations to a single storage area at the Kessler site.
- Monitoring well development continued.
- The data collected from the data logger installed at **MW-9** was evaluated. Based on this data, a new shallow well was decided to be installed near **MW-9.**

PROPOSED SCHEDULE FROM SEPTEMBER 13 TO SEPTEMBER 27, 1992

- Drilling and installation of **MW-9S.**
- Continue with monitoring well development.
- Coordination of the initial sampling round.

NEXT MEETING

September 16, 1992

JCA/lvl/42614.wpf/92-1240

SOIL TECH

WEEKLY MEETING REPORT - 10
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED	:	**September 13 to September 27, 1992**
ATTENDING	:	Ana Gloria Ramos, Designated Coordinator Clinton Moffatt, G&M José C. Agrelot, Soil Tech
PREPARED BY	:	José C. Agrelot, Soil Tech Project Coordinator
DATE PREPARED	:	October 13, 1992

FIELD WORK COMPLETED FROM SEPTEMBER 13 TO SEPTEMBER 27, 1992

- o Drilling of **MW-9S** was completed.
- o Drums containing soil cuttings were all relocated at the Kessler site.
- o Monitoring well development was completed by September 16, 1992.
- o Coordination of the initial sampling round continued.

PROPOSED SCHEDULE FOR SEPTEMBER 27 TO OCTOBER 11, 1992

- o Sampling of monitoring wells will be conducted.

JCA/lvl/42614.wpf\921240

SOIL TECH

WEEKLY MEETING REPORT - 9
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED	:	**August 31 to September 12, 1992**
ATTENDING	:	Ana Gloria Ramos, Designated Coordinator Clinton Moffatt, G&M José C. Agrelot, Soil Tech
PREPARED BY	:	José C. Agrelot, Soil Tech Project Coordinator
DATE PREPARED	:	October 13, 1992

FIELD WORK COMPLETED FROM AUGUST 31 TO SEPTEMBER 12, 1992

- Monitoring wells **MW-6** and **MW-6R** were completed during this period.
- The removal and grouting of **MW-6** was completed.
- Drums containing soil cuttings are being relocated from borehole or monitoring well locations to a single storage area at the Kessler site.
- Monitoring well development continued.
- The data collected from the data logger installed at **MW-9** was evaluated. Based on this data, a new shallow well was decided to be installed near **MW-9**.

PROPOSED SCHEDULE FROM SEPTEMBER 13 TO SEPTEMBER 27, 1992

- Drilling and installation of **MW-9S**.
- Continue with monitoring well development.
- Coordination of the initial sampling round.

NEXT MEETING

September 16, 1992

JCA/lvl/42614.wpf/92-1240

SOIL TECH

WEEKLY MEETING REPORT - 10
TUTU SITE INVESTIGATION
ST. THOMAS, US VIRGIN ISLANDS

PERIOD COVERED	:	**September 13 to September 27, 1992**
ATTENDING	:	Ana Gloria Ramos, Designated Coordinator Clinton Moffatt, G&M José C. Agrelot, Soil Tech
PREPARED BY	:	José C. Agrelot, Soil Tech Project Coordinator
DATE PREPARED	:	October 13, 1992

FIELD WORK COMPLETED FROM SEPTEMBER 13 TO SEPTEMBER 27, 1992

- Drilling of **MW-9S** was completed.
- Drums containing soil cuttings were all relocated at the Kessler site.
- Monitoring well development was completed by September 16, 1992.
- Coordination of the initial sampling round continued.

PROPOSED SCHEDULE FOR SEPTEMBER 27 TO OCTOBER 11, 1992

- Sampling of monitoring wells will be conducted.

JCA/lvl/42614.wpf\921240

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Mr. Gene Eglin
PO Box 7492
St. Thomas, US Virgin Islands 00803

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Mr. Eglin:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

TUT 00-3 1504

Ann L. Hughes 9-9-1992

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Mr. Antoine Ogiste
#3 Brookman Road
St. Thomas, US Virgin Islands 00802

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Mr. Ogiste:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

TUT 003 1505

Kathy Jackson Sept. 17 1992

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Harvey 853
PO Box ~~405~~
St. Thomas, US Virgin Islands 00804

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Sirs:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

Lenny Harvey - 9/11/92

TUT 003 1506

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

9 1992

September 1, 1992

Mr. Conrad E. Francis
Chief Executive Officer
VIHA
PO Box 7668
St. Thomas, US Virgin Islands 00803

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Mr. Francis:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

TUT 003 1507

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Mr. E. Steele
PO Box 2237
St. Thomas, US Virgin Islands 00803

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Mr. Steele:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

Received E. W Steele 9/9/92 TUT 003 1508

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

September 1, 1992

Poly Caribe
PO Box 9338
St. Thomas, US Virgin Islands 00801

RE: Analytical Results for the
Tutu Wells Site Water-Supply Wells
St. Thomas, US. Virgin Islands

Dear Sirs:

As requested by Ms. Caroline Kwan, Project Manager, United States Environmental Protection Agency (USEPA) for Tutu Wells Site Investigation, Tutu Environmental Investigation Committee has enclosed the analytical results for samples collected by Soil Tech and Geraghty & Miller from your well(s), from September 1990 through February 1992. In addition, enclosed is the USEPA Maximum Contaminant Level (MCL) standards for drinking water to compare with the concentrations detected at your Well(s).

MCLs are federal drinking water standards that have been developed to protect human health relative to long-term, lifetime exposures. The USEPA has established these standards to ensure that water consumers who depend on an individual source over their entire lifetime are not subject to undue risk to health.

If you have any questions, please contact Ms. Caroline Kwan at (212) 264-0151 or the undersigned at (809) 749-8943.

Sincerely yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

Enclosures

TUT 003 1509

Joan Pascal Sept 9 1992
Devcon off.

Telephone: (809) 792-2920 Fax. (809) 793-6555

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

October 13, 1992

Eng. Caroline Kwan
Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
US Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

RE: Tutu Well Site
Administrative Order on Consent
Index No. II-RCRA-Proceeding
7003 and 9003-92-0401
Monthly Progress Report No. 8

Dear Mrs. Kwan:

Attached find the Written Monthly Progress Report for the subject Administrative Order.

If you have any question regarding this matter, please contact the undersigned at (809) 749-8943.

Very truly yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

AGR/mpt/EPAKWAN

Attachments

pc: Mr. J. Juanet
Mr. D. Lee
Scott McCay, Esq. - Texaco
Mr. L. Ruiz - Texaco
José A. Cepeda/Francis Torres, Esqs.
Mr. José Font - EPA Caribbean Field Offi TUT 003 1510
Mr. Roy E. Adams - Commissioner DPNR-USV.
Mr. Leonard Reed/ Benjamin Nazario - DPNR-USVI
Mr. J. C. Agrelot - Soil Tech
Mr. T. Danahy - Geraghty & Miller

Telephone: (809) 792-2920 Fax. (809) 793-6555

MONTHLY PROGRESS REPORT NO. 8
October 13, 1992

RE: Administrative Order on Consent
Index No. II - RCRA - Proceeding
7003 & 9003-92-0401

WORK COMPLETED DURING THE MONTH

1. Completion of monitoring well installation on September 14, 1992.

2. Completion of monitoring well development on September 15, 1992.

3. Three composite samples were taken of the drilling cuttings on September 10, 1992 and submitted to Enseco East for Toxicity Characteristic Lecchate Procedure (TCLP) analysis. The purpose of these samples are to characterize the material for proper disposal.

4. Discharge of approximately 4,000 gallons of treated well development water to the sanitary sewer on September 16, 1992.

5. Submittal of September 18, 1992 letter to José Cepeda, Legal Counsel for Esso Standard Oil Company, regarding monitoring well sampling schedule at Four Winds Plaza.

6. Submittal of September 23, 1992 letter to José Cepeda regarding aquifer pumping test schedule at Four Winds Plaza.

7. Start of monitoring well sampling on September 29, 1992.

WORK TO BE COMPLETED DURING NEXT MONTH

1. Completion of monitoring well sampling.

2. Installation of piping from MW 6 and MW 6D to water treatment system for the aquifer pumping tests.

3. Submit letter to José Cepeda regarding installation schedule for MW 6 and MW 6D.

4. Preparation for aquifer pumping tests at MW 6 and MW 6D.

5. Begin Pumping Step Test on October 30, 1992.

ANA GLORIA RAMOS

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

October 21, 1992

Jose Cepeda
Goldman, Antonetti, Ferraiuoli, Axtmayer
P. O. Box 70364
Santurce, Puerto Rico 00936-0364

Re: Aquifer Pumping Tests
Four Winds Plaza
Tutu, St. Thomas, U.S. Virgin Islands

Dear Mr. Cepeda:

As required in the Tutu Service Station Investigation Work Plan, prepared by Geraghty & Miller, Inc. in March 1992, two aquifer pumping tests will be performed at the Tutu Site. Geraghty & Miller has chosen MW-6R and MW-6D for the pumping tests, which are located in the Four Winds Plaza parking lot.

In order to perform the pumping tests, Geraghty & Miller is requesting Four Winds Plaza to turn off their supply wells (Four Winds I, Four Winds II, and Four Winds III) during the aquifer testing (see Table 1). Geraghty & Miller recommends the Splash and Dash Car Wash to fill their cistern via Four Winds I supply well during the morning of Sunday, November 1, 1992 prior to the start of the pumping test on November 2, 1992. If necessary, the Tutu Environmental Investigation Committee (TEIC) will have a water distributor fill the car wash cistern during the pumping tests.

In addition, temporary above-ground piping will have to be installed from MW-6R and MW-6D to the water treatment system located at the Esso Service Station (see Figure 1). Approximately 70 feet of piping will run east from MW-6R and MW-6D to the curb. This

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 (201) 909-0567/0568

section of piping will have to be protected with barricades, therefore pedestrians and vehicular traffic will detour this area. The remaining piping to the water treatment system will not obstruct pedestrians or vehicular traffic. All piping will be installed in accordance with the Occupational Safety & Health Administration (OSHA) regulations. After the aquifer testing is completed the temporary piping will be removed.

If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Clinton Moffatt
Staff Scientist

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman
Vice President/Project Officer

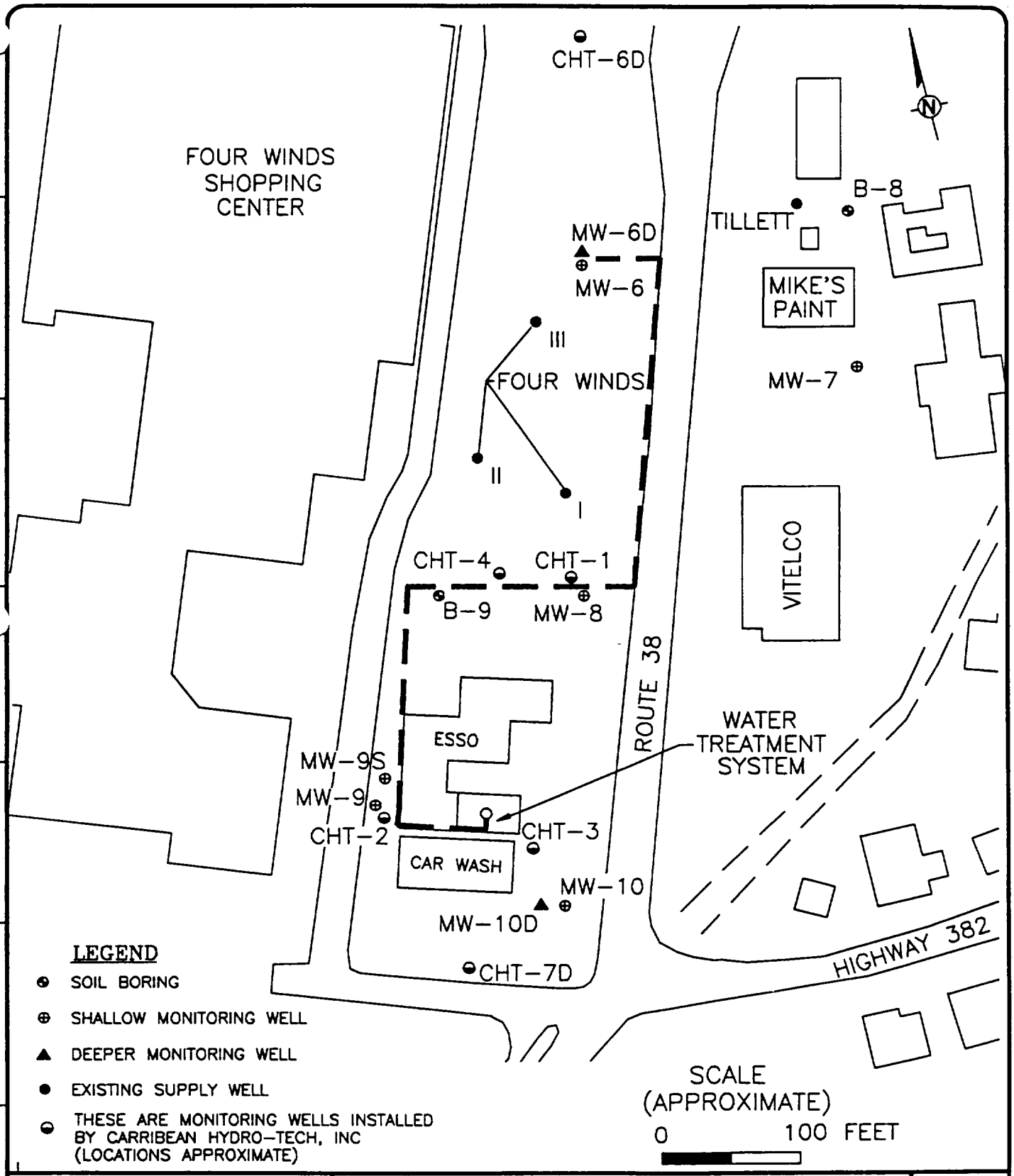
c: Ana Gloria Ramos - TEIC
Jose Agrelot - Soil Tech

CM:cmw
#PR01301-wp3/101492.ltr

Table 1. Anticipated Schedule for Pumping Tests in October and November 1992, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date	Activity
Thursday, October 29	Set–up water–level recorders for pre–pumping trend.
Friday, October 30	4–hour step–test at MW–6D; record recovery. Set–up recorder for pre–pumping trend for November 2 test.
Monday, November 2 @ 10:00 a.m.	Start 72–hour pumping test at MW–6D; pumping rate to be determined from the results of October 30 step–test.
Thursday, November 5 @ 10:00 a.m.	End test; record recovery; data analysis.
Friday, November 6	4–hour step–test at MW–6R; record recovery. Set–up recorder for pre–pumping trend for November 9 pumping test.
Monday, November 9 @ 10:00 a.m.	Start 24–hour pump test at MW–6R; pumping rate to be determined from November 6 step–test.
Tuesday, November 10 @ 10:00 a.m.	End test; record recovery.

PR01301–#3/91492tbl.wk3



DRAFTER: M. NIXON | APPROVED: T. DANAHY | CHECKED: C. MOFFAT | DRAWING: TU-66 | FILE NO.: TU-66 | PRJCT NO.: PR01301 | 0-21-92 | DWG DA

GERAGHTY & MILLER, INC.
Environmental Services

PUMPING TEST PIPING LAYOUT

FIGURE 1

TUTU SERVICE STATION INVESTIGATIC TUT 005 1516
ST. THOMAS, U.S. VIRGIN ISLANDS

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

October 20, 1992

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

Re: Relocation of Pumping Tests and Revised Schedule
Tutu Service Station Investigation
St. Thomas, U.S. Virgin Islands

Dear Ms. Kwan:

Based on information collected from the first round of ground-water sampling of the monitoring wells, Geraghty & Miller, Inc. has decided to relocate the upcoming pumping tests from MW-10 and MW-10D to MW-6R and MW-6D. During the purging of MW-10, the well was pumped dry within 12 minutes at a rate of 2 gallons per minute (gpm) and MW-10D was pumped dry within 25 minutes at a rate of 8 gpm. In comparison, MW-6R and MW-6D maintained a flow rate of 4 gpm and 8 gpm, respectively, therefore providing a sufficient yield for the pumping tests.

Table 1 presents an update of the preliminary schedule for the pumping tests. As requested by the USEPA and agreed to by Ana Gloria Ramos, Designated Coordinator, Tutu Environmental Investigation Committee, the current schedule includes an extension of the pumping test at the deep monitoring well (MW-6D) to possibly 72 hours, in order to allow for stabilization after potential delayed yield. The 72-hour pumping test will be stopped after 24 or 48 hours if the data indicates that a delayed yield is not still present. The field data will be

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 • FAX (201) 909-0567/0568

plotted for review by USEPA representatives prior to deciding when to end the test. If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Clinton Moffatt
Staff Scientist

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman
Project Director/Project Officer

c: Ana Gloria Ramos - TEIC
Jose Agrelot - Soil Tech
Sally Odland - CDM

CM:cmw
#PR01301-wp3/101392.LTR

Table 1. Anticipated Schedule for Pumping Tests in October and November 1992, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date	Activity
Thursday, October 29	Set-up water-level recorders for pre-pumping trend.
Friday, October 30	4-hour step-test at MW-6D; record recovery. Set-up recorder for pre-pumping trend for November 2 test.
Monday, November 2 @ 10:00 a.m.	Start 72-hour pumping test at MW-6D; pumping rate to be determined from the results of October 30 step-test.
Thursday, November 5 @ 10:00 a.m.	End test; record recovery; data analysis.
Friday, November 6	4-hour step-test at MW-6R; record recovery. Set-up recorder for pre-pumping trend for November 9 pumping test.
Monday, November 9 @ 10:00 a.m.	Start 24-hour pump test at MW-6R; pumping rate to be determined from November 6 step-test.
Tuesday, November 10 @ 10:00 a.m.	End test; record recovery.

PR01301-#3/91492tbl.wk3

Tutu Environmental Investigation Committee
(T E I C)
G.P.O. Box 4269
San Juan, Puerto Rico 00936-4269

Ana Gloria Ramos, P.E.
Designated Coordinator

November 11, 1992

Eng. Caroline Kwan
Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
US Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

RE: Tutu Well Site
Administrative Order on Consent
Index No. II-RCRA-Proceeding
7003 and 9003-92-0401
Monthly Progress Report No. 9

Dear Mrs. Kwan:

Attached find the Written Monthly Progress Report for the subject Administrative Order.

If you have any question regarding this matter, please contact the undersigned at (809) 749-8943.

Very truly yours,

Ana Gloria Ramos

Ana Gloria Ramos, P.E.
Designated Coordinator

AGR/mpt/EPAKWAN

Attachments

pc: Mr. J. Juanet
Mr. D. Lee
Scott McCay, Esq. - Texaco
Mr. L. Ruiz - Texaco
José A. Cepeda/Francis Torres, Esqs.
Mr. José Font - EPA Caribbean Field Office
Mr. Roy E. Adams - Commissioner DPNR-USVI
Mr. Leonard Reed/ Mr. Benjamin Nazario - DPNR-USVI
Mr. J. C. Agrelot - Soil Tech
Mr. T. Danahy - Geraghty & Miller

TUT 003 1520

Telephone: (809) 792-2920 Fax. (809) 793-6555

MONTHLY PROGRESS REPORT NO. 9
November 11, 1992

RE: Administrative Order on Consent
Index No. II - RCRA - Proceeding
7003 & 9003-92-0401

WORK COMPLETED DURING THE MONTH

1. Completed sampling of all monitoring wells.

2. Submitted letter to José Cepeda, Esq. regarding piping installation schedule for Monitoring Wells MW-6 and MW-6D. Letter dated October 21, 1992.

3. Installation of piping from Monitoring Wells MW-6 and MW-6D to water treatment system for the aquifer pumping tests.

4. Preparation for aquifer pumping tests at Monitoring Wells MW-6 and MW-6D. Begin Monitoring Well MW-6 step-test on October 30, 1992.

5. Received and reviewed surveying data for monitoring well elevations.

6. Prepared October 20 letter to Caroline Kwan Re: Relocation of Pumping Tests and Revised Schedule.

7. Received approval on October 29, 1992 from John Dema, Esq. legal counsel for Four Winds, for use of Monitoring Wells CHT-6D and CHT-4 for water-level measurements during the pumping tests. This approval was coordinated by the U.S. Environmental Protection Agency (USEPA).

8. Prepared October 26 letter to José Cepeda, esq. (cc: Leonard Reed and Ana Gloria Ramos) Re: Soil Quality Data at the Curriculum Center Building (Former Laga Building).

9. Prepared October 29 letter to Caroline Kwan Re: detailed schedule for pumping tests.

10. Prepared October 30 letter to Leonard Reed requesting assistance in temporarily stopping operation of the Eglin supply wells.

11. Performed Quality Control/Quality Assurance (QA/QC) field audit during monitoring well sampling.

12. Began data validation of soil analytical results.

13. Coordinated pumping test schedule with the USEPA, Four Winds Plaza, and CDM Federal Programs (CDM).

14. Performed 4-hour step test at Monitoring Well MW-6 on October 30, 1992.

WORK TO BE COMPLETED DURING NEXT MONTH

1. Continue soil data validation. Begin ground-water data validation.

2. Complete pumping tests at Monitoring Wells MW-6 and MW-6D.

3. Attend November 17 site walkover and meeting with USEPA. Coordinate schedule for risk assessment, and submission of Technical Memo II and the Remedial Investigation (RI) Report.

4. Continue data reduction and report preparation. Technical Memorandum II will be the first deliverable (anticipated submission date; late December/early January).

ANA GLORIA RAMOS

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

October 26, 1992

Jose A. Cepeda
Goldman, Antonetti, Ferrainoli & Axtmayer
P.O. Box 70364
Santurce, Puerto Rico 00963-0364

Re: Soil Quality Data, Curriculum Center Building (Former Laga Building), Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Dear Mr. Cepeda:

Pursuant to a request from Francis Torres of Goldman, Antonetti, Ferrainoli & Axtmayer, and on behalf of Ana Gloria Ramos, Designated Coordinator for the Tutu Environmental Investigation Committee (TEIC), Geraghty & Miller, Inc. is submitting the preliminary (i.e., unvalidated) laboratory soil quality data. These samples, identified as B-14, B-15, and B-16, were collected on the north side of the Curriculum Center Building (former Laga Building). The general locations of the soil borings are shown on the attached figure.

If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Clinton Moffatt
Staff Scientist

Thomas V. Danahy
Senior Scientist/Project Manager

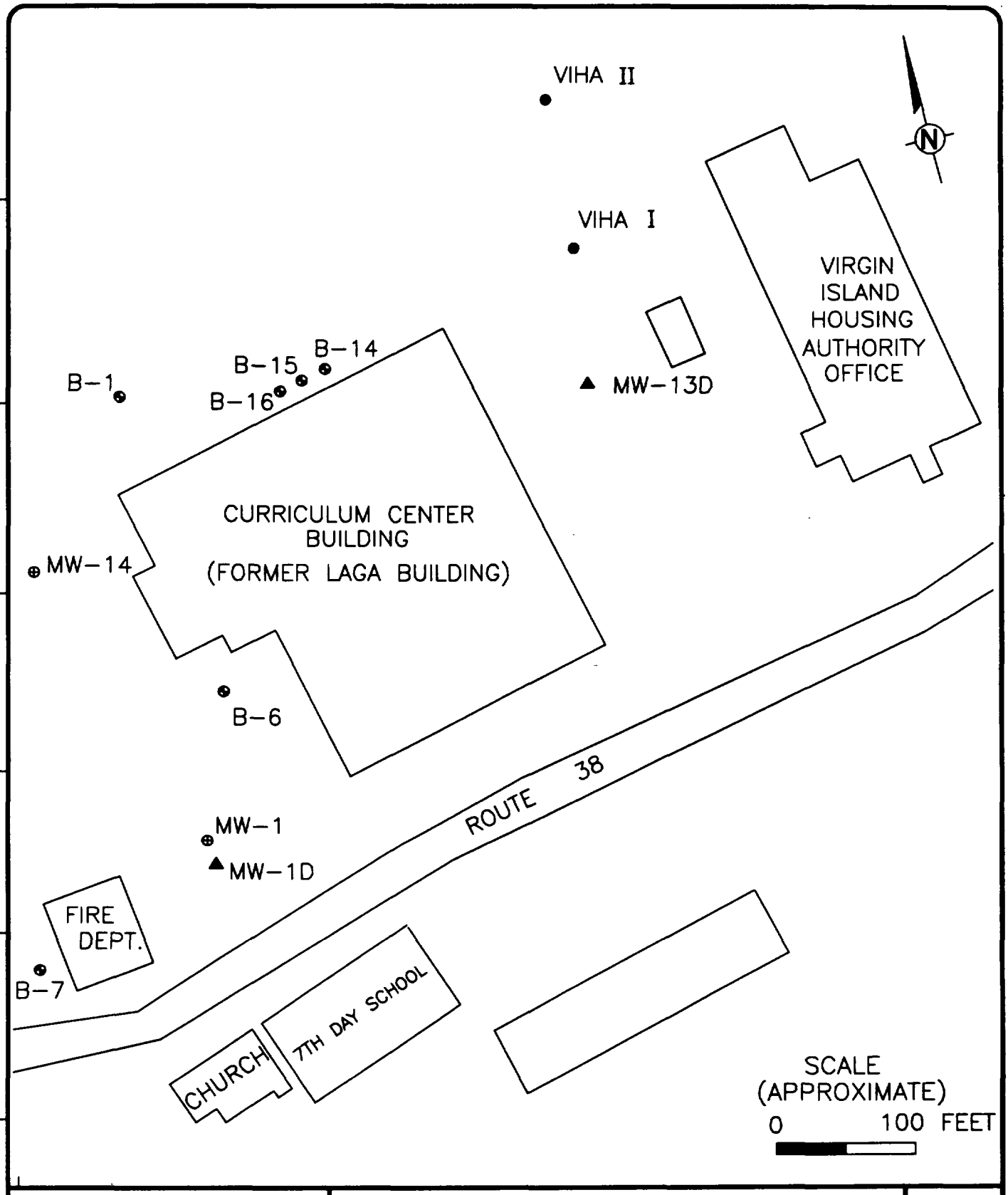
Daniel A. Nachman
Vice President/Project Director

c: Leonard Reed - DPNR
Ana Gloria Ramos - TEIC

CM/mtb
#PR01301-#3/101392a.ltr

TUT 003 1523

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 • FAX (201) 909-0567/0568



DRAFTER: NIXON | APPROVED: DANAHY | CHECKED: MOFFAT | DRAWING: TU-64 | FILE NO.: TU-64 | PRJCT NO.: NJ01301 | DWG DATE: 10-22-92

GERAGHTY & MILLER, INC.
Environmental Services

GENERAL LOCATION OF SOIL BORINGS B-14 THROUGH B-16

TUTU SERVICE STATION INVESTIGATION
ST. THOMAS, U.S. VIRGIN ISLANDS

FIGURE 1

Table 1. Concentrations of Volatile Organic Compounds in Soil Samples Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: B-14 (0-2.0') Date: 14-Aug-92	B-15 (0-2.0') 14-Aug-92	B-16 (0-2.0') 14-Aug-92
Chloromethane	11 U	12 U	11 U
Bromomethane	11 U	12 U	11 U
Vinyl chloride	11 U	12 U	11 U
Chloroethane	11 U	12 U	11 U
Methylene chloride	9 J	9 J	8 J
Acetone	11 U	12 U	11 U
Carbon disulfide	11 U	12 U	11 U
1,1-Dichloroethene	11 U	12 U	11 U
1,1-Dichloroethane	11 U	12 U	11 U
1,2-Dichloroethene (cis/trans)	11 U	12 U	11 U
Chloroform	11 U	12 U	11 U
1,2-Dichloroethane	11 U	12 U	11 U
2-Butanone	11 U	12 U	11 U
1,1,1-Trichloroethane	11 U	12 U	11 U
Carbon tetrachloride	11 U	12 U	11 U
Bromodichloromethane	11 U	12 U	11 U
1,2-Dichloropropane	11 U	12 U	11 U
cis-1,3-Dichloropropene	11 U	12 U	11 U
Trichloroethene	11 U	6 J	11 U
Dibromochloromethane	11 U	12 U	11 U
1,1,2-Trichloroethane	11 U	12 U	11 U
Benzene	11 U	12 U	11 U
trans-1,3-Dichloropropene	11 U	12 U	11 U
Bromoform	11 U	12 U	11 U
4-Methyl-2-pentanone	11 U	12 U	11 U
2-Hexanone	11 U	12 U	11 U
1,1,2,2-Tetrachloroethane	11 U	12 U	11 U
Tetrachloroethene	72	170	23
Toluene	2 J	12	11 J
Chlorobenzene	11 U	12 U	11 U
Ethylbenzene	11 U	12 U	11 U
Styrene	11 U	12 U	11 U
Xylenes (total)	11 U	12 U	11 U
1,2-Dibromoethane (EDB)	5.7 U	6 U	5.6 U
tert-Butyl methyl ether	11 U	12 U	11 U
n-Propylbenzene	5.7 U	6 U	5.6 U

Analyte concentrations in micrograms per kilogram (parts per billion [ppb]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using March 1990 Contract Laboratory Program (CLP) protocols.

J Result is detected below the reporting limit and/or is an estimated concentration.
U Compound or element analyzed for, but not detected at the corresponding reporting limit.

Table 2. Concentrations of Volatile Organic Compounds in the Field Blank and the Trip Blank Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: Field Blank Date: 14-Aug-92	Trip Blank 14-Aug-92
Chloromethane	10 U	10 U
Bromomethane	10 U	10 U
Vinyl chloride	10 U	10 U
Chloroethane	10 U	10 U
Methylene chloride	10 U	2 J
Acetone	10 U	10 U
Carbon disulfide	10 U	10 U
1,1-Dichloroethene	10 U	10 U
1,1-Dichloroethane	10 U	10 U
1,2-Dichloroethene (cis/trans)	10 U	10 U
Chloroform	10 U	10 U
1,2-Dichloroethane	10 U	10 U
2-Butanone	10 U	10 U
1,1,1-Trichloroethane	10 U	10 U
Carbon tetrachloride	10 U	10 U
Bromodichloromethane	10 U	10 U
1,2-Dichloropropane	10 U	10 U
trans-1,3-Dichloropropene	10 U	10 U
Trichloroethene	10 U	10 U
Dibromochloromethane	10 U	10 U
1,1,2-Trichloroethane	10 U	10 U
Benzene	10 U	10 U
cis-1,3-Dichloropropene	10 U	10 U
Bromoform	10 U	10 U
4-Methyl-2-pentanone	10 U	10 U
2-Hexanone	10 U	10 U
1,1,2,2-Tetrachloroethane	10 U	10 U
Tetrachloroethene	10 U	10 U
Toluene	10 U	10 U
Chlorobenzene	10 U	10 U
Ethylbenzene	10 U	10 U
Styrene	10 U	10 U
Xylenes (total)	10 U	10 U
1,2-Dibromoethane (EDB)	5 U	5 U
tert-Butyl methyl ether	10 U	10 U
n-Propylbenzene	5 U	5 U

Analyte concentrations in micrograms per liter (parts per billion [ppb]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using March 1990 Contract Laboratory Program (CLP) protocols.

J Result is detected below the reporting limit and/or is an estimated concentration.
U Compound or element analyzed for, but not detected at the corresponding reporting limit.

10/28/92 11:44 am

Table 3. Concentrations of Base Neutral and Acid Extractable Organic Compounds in Soil Samples Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: B-14 (0-2.0') Date: 14-Aug-92	B-15 (0-2.0') 14-Aug-92	B-16 (0-2.0') 14-Aug-92
Acenaphthene	370 U	390 U	370 U
Acenaphthylene	370 U	390 U	370 U
Anthracene	370 U	390 U	370 U
9H-Carbazole	370 U	390 U	370 U
Benzo(a)anthracene	370 U	390 U	370 U
Benzo(a)pyrene	370 U	390 U	370 U
Benzo(b)fluoranthene	370 U	390 U	370 U
Benzo(g,h,i)perylene	370 U	390 U	370 U
Benzo(k)fluoranthene	370 U	390 U	370 U
4-Bromophenyl phenyl ether	370 U	390 U	370 U
Butyl benzyl phthalate	370 U	390 U	58 J
4-Chloroaniline	370 U	390 U	370 U
bis(2-Chloroethoxy)methane	370 U	390 U	370 U
bis(2-Chloroethyl)ether	370 U	390 U	370 U
bis(2-Chloroisopropyl)ether	370 U	390 U	370 U
4-Chloro-3-methylphenol	370 U	390 U	370 U
2-Chloronaphthalene	370 U	390 U	370 U
2-Chlorophenol	370 U	390 U	370 U
4-Chlorophenyl phenyl ether	370 U	390 U	370 U
Chrysene	370 U	390 U	370 U
Di-n-butyl phthalate	370 U	390 U	370 U
Dibenz(a,h)anthracene	370 U	390 U	370 U
Dibenzofuran	370 U	390 U	370 U
1,2-Dichlorobenzene	370 U	390 U	370 U
1,3-Dichlorobenzene	370 U	390 U	370 U
1,4-Dichlorobenzene	370 U	390 U	370 U
3,3'-Dichlorobenzidine	370 U	390 U	370 U
2,4-Dichlorophenol	370 U	390 U	370 U
Diethyl phthalate	370 U	390 U	370 U
2,4-Dimethylphenol	370 U	390 U	370 U
Dimethyl phthalate	370 U	390 U	370 U
4,6-Dinitro-2-methylphenol	910 U	950 U	890 U
2,4-Dinitrophenol	910 U	950 U	890 U
2,4-Dinitrotoluene	370 U	390 U	370 U
2,6-Dinitrotoluene	370 U	390 U	370 U
Di-n-octyl phthalate	370 U	390 U	370 U
bis(2-Ethylhexyl)phthalate	370 U	390 U	110 J
Fluoranthene	370 U	390 U	370 U

Analyte concentrations in micrograms per kilogram (parts per billion [ppb]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using March 1990 Contract Laboratory Program (CLP) protocols.

J Result is detected below the reporting limit and/or is an estimated concentration.
U Compound or element analyzed for was not detected at the corresponding reporting limit.

Table 3. Concentrations of Base Neutral and Acid Extractable Organic Compounds in Soil Samples Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: / Date:	B-14 (0-2.0') 14-Aug-92	B-15 (0-2.0') 14-Aug-92	B-16 (0-2.0') 14-Aug-92
Fluorene		370 U	390 U	370 U
Hexachlorobenzene		370 U	390 U	370 U
Hexachlorobutadiene		370 U	390 U	370 U
Hexachlorocyclopentadiene		370 U	390 U	370 U
Hexachloroethane		370 U	390 U	370 U
Indeno(1,2,3-cd)pyrene		370 U	390 U	370 U
Isophorone		370 U	390 U	370 U
2-Methylnaphthalene		370 U	390 U	370 U
2-Methylphenol		370 U	390 U	370 U
4-Methylphenol		370 U	390 U	370 U
Naphthalene		370 U	390 U	370 U
2-Nitroaniline		910 U	950 U	890 U
3-Nitroaniline		910 U	950 U	890 U
4-Nitroaniline		910 U	950 U	890 U
Nitrobenzene		370 U	390 U	370 U
2-Nitrophenol		370 U	390 U	370 U
4-Nitrophenol		910 U	950 U	870 U
N-Nitrosodiphenylamine		370 U	390 U	370 U
N-Nitroso-di-n-propylamine		370 U	390 U	370 U
Pentachlorophenol		910 U	950 U	890 U
Phenanthrene		370 U	390 U	370 U
Phenol		370 U	390 U	370 U
Pyrene		370 U	390 U	370 U
1,2,4-Trichlorobenzene		370 U	390 U	370 U
2,4,5-Trichlorophenol		910 U	950 U	890 U
2,4,6-Trichlorophenol		370 U	390 U	370 U

Analyte concentrations in micrograms per kilogram (parts per billion [ppb]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using March 1990 Contract Laboratory Program (CLP) protocols.

J Result is detected below the reporting limit and/or is an estimated concentration.
U Compound or element analyzed for, but not detected at the corresponding reporting limit.

Table 4. Concentrations of Base Neutral and Acid Extractable Organic Compounds in the Field Blank Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: Field Blank Date: 14-Aug-92
Acenaphthene	10 U
Acenaphthylene	10 U
Anthracene	10 U
9H-Carbazole	10 U
Benzo(a)anthracene	10 U
Benzo(b)fluoranthene	10 U
Benzo(k)fluoranthene	10 U
Benzo(g,h,i)perylene	10 U
Benzo(a)pyrene	10 U
4-Bromophenyl phenyl ether	10 U
Butyl benzyl phthalate	10 U
4-Chloroaniline	10 U
bis(2-Chloroethoxy)methane	10 U
bis(2-Chloroethyl)ether	10 U
bis(2-Chloroisopropyl)ether	10 U
4-Chloro-3-methylphenol	10 U
2-Chloronaphthalene	10 U
2-Chlorophenol	10 U
4-Chlorophenyl phenyl ether	10 U
Chrysene	10 U
Dibenz(a,h)anthracene	10 U
Dibenzofuran	10 U
Di-n-butyl phthalate	10 U
1,2-Dichlorobenzene	10 U
1,3-Dichlorobenzene	10 U
1,4-Dichlorobenzene	10 U
3,3'-Dichlorobenzidine	10 U
2,4-Dichlorophenol	10 U
Diethyl phthalate	10 U
2,4-Dimethylphenol	10 U
Dimethyl phthalate	10 U
4,6-Dinitro-2-methylphenol	25 U
2,4-Dinitrophenol	25 U
2,4-Dinitrotoluene	10 U
2,6-Dinitrotoluene	10 U
Di-n-octyl phthalate	10 U
bis(2-Ethylhexyl)phthalate	47 B
Fluoranthene	10 U

Analyte concentrations in micrograms per liter (parts per billion [ppb]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using March 1990 Contract Laboratory Program (CLP) protocols.

B Analyte is detected in the laboratory blank.
U Compound or element analyzed for, but not detected at the corresponding reporting limit.

Table 4. Concentrations of Base Neutral and Acid Extractable Organic Compounds in the Field Blank Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: Field Blank Date: 14-Aug-92
Fluorene	10 U
Hexachlorobenzene	10 U
Hexachlorobutadiene	10 U
Hexachlorocyclopentadiene	10 U
Hexachloroethane	10 U
Indeno(1,2,3-cd)pyrene	10 U
Isophorone	10 U
2-Methylnaphthalene	10 U
2-Methylphenol	10 U
4-Methylphenol	10 U
Naphthalene	10 U
2-Nitroaniline	25 U
3-Nitroaniline	25 U
4-Nitroaniline	25 U
Nitrobenzene	10 U
2-Nitrophenol	10 U
4-Nitrophenol	25 U
N-Nitrosodiphenylamine	10 U
N-Nitroso-di-n-propylamine	10 U
Pentachlorophenol	25 U
Phenanthrene	10 U
Phenol	10 U
Pyrene	10 U
1,2,4-Trichlorobenzene	10 U
2,4,5-Trichlorophenol	25 U
2,4,6-Trichlorophenol	10 U

Analyte concentrations in micrograms per liter (parts per billion [ppb]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using March 1990 Contract Laboratory Program (CLP) protocols.

B Analyte is detected in the laboratory blank.
U Compound or element analyzed for, but not detected at the corresponding reporting limit.

Table 5. Concentrations of Metals in Soil Samples Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: / Date:	B-14 (0-2.0') 14-Aug-92	B-15 (0-2.0') 14-Aug-92	B-16 (0-2.0') 14-Aug-92
Aluminum		25300	26400	18900
Antimony		7.3 BN	6.4 BN	6.8 BN
Arsenic		0.46 U	1.3 B	11.6
Barium		34.5 B	32.1 B	39.9 B
Beryllium		0.23 U	0.23 U	0.22 U
Cadmium		0.7 U	0.7 U	0.99 B
Calcium		120000 *	89400 *	68800 *
Chromium		13.8 N	27.3 N	36.4 N
Cobalt		20	23.2	19
Copper		48.3 N	65.9 N	72.1 N
Iron		28000	32600	30600
Lead		2.9	12.2	45.6 N*
Magnesium		26200	22900	16300
Manganese		757	809	599
Mercury		0.06 U	0.06 U	0.57
Nickel		11.1	16.5	15.7
Potassium		161 B	389 B	506 B
Selenium		0.46 UW	0.46 UW	0.44 U
Silver		0.93 B	1.1 B	1.3 B
Sodium		181 B	281 B	396 B
Thallium		0.7 U	0.7 U	0.67 U
Vanadium		95.8 N	98.8 N	79.7 N
Zinc		50.9	206	459

Analyte concentrations in milligrams per kilogram (parts per million [ppm]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using March 1990 Contract Laboratory Program (CLP) protocols.

* Duplicate analysis not within control limits.
B Reported value is between contract required detection limit (CRDL) and instrument detection limit (IDL).
N Spiked sample recovery not within control limits.
U Compound or element analyzed for, but not detected at the corresponding reporting limit.
W Post-digestion spike for graphite furnace atomic absorption (GFAA) out of control limits.

10/27/92 5:28 pm

Table 6. Concentrations of Metals in the Field Blank Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: Field Blank Date: 14-Aug-92
Aluminum	32 U
Antimony	20 U
Arsenic	2 U
Barium	1 U
Beryllium	1 U
Cadmium	3 U
Calcium	73.2 B
Chromium	4 U
Cobalt	4 U
Copper	4 U
Iron	9.5 B
Lead	1 U
Magnesium	35 U
Manganese	1.1 B
Mercury	0.1 U
Nickel	8 U
Potassium	560 U
Selenium	2 U
Silver	4 U
Sodium	222 B
Thallium	3 U
Vanadium	4 U
Zinc	2 U

Analyte concentrations in micrograms per liter (parts per billion [ppb]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using March 1990 Contract Laboratory Program (CLP) protocols.

B Reported value is between contract required detection limit (CRDL) and instrument detection limit (IDL).
U Compound or element analyzed for, but not detected at the corresponding reporting limit.

10/27/92 5:37 pm

Table 7. Concentrations of Total Petroleum Hydrocarbons in Soil Samples Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: / Date:	B-14 (0-2.0') 14-Aug-92	B-15 (0-2.0') 14-Aug-92	B-16 (0-2.0') 14-Aug-92
Total Petroleum Hydrocarbons		250 D	<24	82

Analyte concentrations in milligrams per kilogram (parts per million [ppm]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using U.S. Army Corp of Engineers method CE81-1.

D Analyte identified at a secondary dilution.
< Less than. Where an analyte has not been detected, a reporting limit is given.

10/27/92 5:43 pm

Table 8. Concentrations of Total Petroleum Hydrocarbons in the Field Blank Collected in August 1992 at the Tutu Wells Site, St. Thomas, Virgin Islands.

Analyte	Sample ID: Field Blank Date: 14-Aug-92
Total Petroleum Hydrocarbons	<0.5

Analyte concentrations in milligrams per liter (parts per million [ppm]).
Analyses were performed by Enseco-East of Somerset, New Jersey, using USEPA Method 418.1.

< Less than. Where an analyte has not been detected, a reporting limit is given.

10/27/92 5:53 pm

GERAGHTY & MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

October 29, 1992

Ms. Caroline Kwan, Project Manager
U.S. Environmental Protection Agency
26 Federal Plaza, Room 737
New York, NY 10278

Re: Anticipated Schedule for Pumping Tests
Tutu Service Station Investigation
St. Thomas, U.S. Virgin Islands

Dear Ms. Kwan:

Table 1 enclosed provides a detailed schedule for the pumping tests to be performed at the above referenced site. Due to field conditions, minor delays or modifications may be necessary. The on-site USEPA representative will be kept advised of any scheduling changes. If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman
Project Director/Project Officer

c: Ana Gloria Ramos - TEIC
Jose Agrelot - Soil Tech
Sally Odland, CDM

#PR01301/102892.ltr

TUT 003 1535

201 West Passaic Street, 3rd Floor • Rochelle Park, New Jersey 07662 • (201) 909-0700 • FAX (201) 909-0567/0568

Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
Thurs., Oct. 29, 1992 C. Moffatt R. Ponciano Soil Tech	Finalize pump installation at MW-6D and piping to treatment system. Short 10 to 20 minute test of pump; set flowrate to 8 gpm. Set-up data recorders to record overnight; readings at 30 minute intervals.
Fri., Oct. 30, 1992 C. Moffatt R. Ponciano Soil Tech	7:30-8:30 a.m. - Collect water-level measurements. 8:30-9:30 a.m. - Re-set data recorders for delayed start at 10:00 a.m., log cycle intervals not exceeding 30 second intervals. 10:00 a.m. (or a few seconds after 10:00 a.m. but not before) - Start Step Test at MW-6D; Step 0 at 8 gpm. Note steps are numbered 0 through 3 (4 steps). 11:00 a.m. - Begin Step 1 at MW-6D at 10 gpm. 12:00 (noon) - Begin Step 2 at MW-6D at 12 gpm. 13:00 - Begin Step 3 at MW-6D at 14 gpm. Sample influent to treatment system for field GC and lab analysis. 14:00 - End of Step Test. Set pump rate to 8 to 14 gpm (depending on drawdown) for Monday's test. Turn pump off. Record recovery. Sample treatment effluent for field GC and lab analysis. 15:00 - End of recovery data collection. Remove/download data recorders. Collect water-level measurements at data logger locations. 16:00 - 17:00 - Collect complete round of water-levels. Reset data recorders; linear scale, 30 minute intervals for pre-pumping measurements over Saturday and Sunday.

TUT 003 1536

Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
Mon., Nov. 2, 1992 C. Moffatt R. Ponciano A. Colberg W. Morales D. McGregor Soil Tech	7:30-8:30 - Collect complete round of water-levels. 8:30-9:30 - Reset data recorders for delayed start at 10:00 a.m., log cycle intervals not exceeding 5-minute intervals. 10:00 (or a few seconds after 10:00) - Start 72-hour continuous rate pumping test at MW-6D. Pump rate (between 8 to 14 gpm) should be preset based upon Friday's step test. Take manual measurements at pumping well for plotting of data. 11:30 - Sample influent to treatment system for field GC and lab. 12:00 - Sample effluent for field GC and lab. Continue to collect influent and effluent samples for field GC every 2 hours. Measure complete round of water-levels (including data recorders with drop pipes and non-date recorder locations) on an hourly basis until 14 hours (12:00 midnight) into pump test. After 14 hours, measure complete rounds every 2 hours.
Tues., Nov. 3, 1992 C. Moffatt R. Ponciano A. Colberg D. McGregor (Soil Tech not onsite)	10:00 - Twenty-four hours into test. Sample influent and effluent for field GC and lab analysis. Evaluate data plotted from pumping well for delayed yield. If delayed yield is not present, stop test and record recovery. If possible, have recorder start new step just prior to turning pump off.
Wed., Nov. 4, 1992 C. Moffatt R. Ponciano D. McGregor Soil Tech	10:00 - Fourty-eight hours into test. Sample influent and effluent for field GC and lab analysis. If delayed yield is not present, stop test and record recovery.

Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
Thurs., Nov. 5, 1992 C. Moffatt R. Ponciano D. McGregor Soil Tech	10:00 - Seventy-two hours into test. Sample influent and effluent for field GC and lab analysis. Stop test and record recovery. 14:00 - Measure water level at MW-6. Remove MW-6 data recorder. 14:00 - 15:00 - Finalize pump installation at MW-6 and piping to treatment system. 16:00 - Short 10 to 20 minute test of pump; set flowrate to 2 gpm. Set-up data recorders to record overnight; readings at 30 minute intervals.
Fri., Nov. 6, 1992 C. Moffatt R. Ponciano Soil Tech	7:30-8:30 a.m. - Collect water-level measurements. 8:30-9:30 a.m. - Re-set data recorders for delayed start at 10:00 a.m., log cycle intervals not exceeding 30 second intervals. 10:00 a.m. (or a few seconds after 10:00 a.m. but not before) - Start Step Test at MW-6D; Step 0 at 2 gpm. Note steps are numbered 0 through 3 (4 steps). 11:00 a.m. - Begin Step 1 at MW-6D at 4 gpm. 12:00 (noon) - Begin Step 2 at MW-6D at 6 gpm. 13:00 - Begin Step 3 at MW-6D at 8 gpm. Sample influent to treatment system for field GC and lab analysis.

Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
	14:00 - End of Step Test. Set pump rate to 2 to 8 gpm (depending on drawdown) for Monday's test. Turn pump off. Record recovery. Sample treatment effluent for field GC and lab analysis.
	15:00 - End of recovery data collection. Remove/download data recorders. Collect water-level measurements.
	16:00-17:00 - Reset data recorders; linear scale, 30 minute intervals for pre-pumping measurements over Saturday and Sunday.
Mon., Nov. 9, 1992 C. Moffatt R. Ponciano D. McGregor Soil Tech	7:30-8:30 - Collect water levels.
	8:30-9:30 - Reset data recorders for delayed start at 10:00 a.m., log cycle intervals not exceeding 30 second intervals.
	10:00 - Start 24-hour continuous rate pumping test at MW-6. Pump rate should have been preset on Friday (between 2 to 8 gpm).
	11:30 - Sample influent to treatment system for field GC and lab analysis.
	12:00 (noon) - Sample effluent for field GC and lab analysis. Continue to collect influent and effluent every 2 hours for field GC analysis. Measure complete round of water-levels (including data recorders with drop pipes and non-data recorder locations) on an hourly basis until 14 hours (12:00 midnight) into pump test. After 14 hours measure complete rounds every 2 hours.

Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
Tues., Nov. 10, 1992 C. Moffatt R. Ponciano D. McGregor Soil Tech	9:00 - Sample influent and effluent for field GC and lab analysis. 10:00 - End of 24-hour test. If possible "step" recorder to record recovery. Stop pump and record recovery. 14:00 - Check recovery. If recovery is equal to or greater than 85 percent complete, remove data recorders. Collect full round of water-level measurements.

#PR01301-wp3/102692.tbl

TUT 003 1540

GERAGHTY & MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

October 30, 1992

Leonard Reed
Department of Planning and Natural Resources
45A Estate Nisky, Suite 231
St. Thomas, U.S. Virgin Islands 00802

Re: Tutu Aquifer Pumping Tests
St. Thomas, U.S. Virgin Islands

Dear Mr. Reed:

As a result of recent water-level monitoring in the Tutu area, Geraghty & Miller, Inc. has determined the Eglin supply wells are in operation. In order for Geraghty & Miller to perform the aquifer pumping tests, the Eglin supply wells will have to be shut off during the test period (see attached schedule). Geraghty & Miller is requesting the assistance of the Department of Planning and Natural Resources to contact the Eglin well owners regarding this subject.

In addition, Geraghty & Miller is requesting the Eglin well owners to fill their cistern on the morning of Sunday, November 1, 1992, prior to the aquifer testing. If necessary, the Tutu Environmental Investigation Committee (TEIC) will provide a water distributor to fill their cistern during the aquifer testing period.

If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Clinton Moffatt

Clinton Moffatt
Staff Scientist

Thomas V. Danahy

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman
Vice President/Project Director

cc: **Ana Gloria Ramos - TEIC**
Caroline Kwan - USEPA
Sally Odland - CDM

TUT 003 1541

CM/mtb
#PR01301-#3/102992.ltr

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Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
Fri., Oct. 30, 1992 C. Moffatt R. Ponciano A. Colberg W. Morales Soil Tech	7:30-8:30 a.m. - Collect water-level measurements. 8:30-9:30 a.m. - Re-set data recorders for delayed start at 10:00 a.m., log cycle intervals not exceeding 30 second intervals. 10:00 a.m. (or a few seconds after 10:00 a.m. but not before) - Start Step Test at MW-6; Step 0 at 2 gpm. Note steps are numbered 0 through 3 (4 steps). 11:00 a.m. - Begin Step 1 at MW-6 at 4 gpm. 12:00 (noon) - Begin Step 2 at MW-6 at 6 gpm. 13:00 - Begin Step 3 at MW-6 at 8 gpm. Sample influent to treatment system for field GC and lab analysis. 14:00 - End of Step Test. Set pump rate to 2 to 8 gpm (depending on drawdown) for Monday's test. Turn pump off. Record recovery. Sample treatment effluent for field GC and lab analysis. 15:00 - End of recovery data collection. Remove/download data recorders. Collect water-level measurements. 16:00-17:00 - Reset data recorders; linear scale, 30 minute intervals for pre-pumping measurements over Saturday and Sunday.
Mon., Nov. 2, 1992 C. Moffatt R. Ponciano D. McGregor A. Colberg W. Morales Soil Tech	7:30-8:30 - Collect water levels. 8:30-9:30 - Reset data recorders for delayed start at 10:00 a.m., log cycle intervals not exceeding 30 second intervals.

Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
	10:00 - Start 24-hour continuous rate pumping test at MW-6. Pump rate should have been preset on Friday (between 2 to 8 gpm). 11:30 - Sample influent to treatment system for field GC and lab analysis. 12:00 (noon) - Sample effluent for field GC and lab analysis. Continue to collect influent and effluent every 2 hours for field GC analysis. Measure complete round of water-levels (including data recorders with drop pipes and non-data recorder locations) on an hourly basis until 14 hours (12:00 midnight) into pump test. After 14 hours measure complete rounds every 2 hours.
Tues., Nov. 3, 1992 C. Moffatt R. Ponciano D. McGregor (Soil Tech not onsite)	9:00 - Sample influent and effluent for field GC and lab analysis. 10:00 - End of 24-hour test. If possible "step" recorder to record recovery. Stop pump and record recovery. 14:00 - Check recovery. If recovery is equal to or greater than 85 percent complete, remove data recorders. Collect full round of water-level measurements.
Wed., Nov. 4, 1992 C. Moffatt R. Ponciano D. McGregor Soil Tech	7:30-8:30 a.m. - Collect water-level measurements. 8:30-9:30 a.m. - Re-set data recorders for delayed start at 10:00 a.m., log cycle intervals not exceeding 30 second intervals. 10:00 a.m. (or a few seconds after 10:00 a.m. but not before) - Start Step Test at MW-6D; Step 0 at 8 gpm. Note steps are numbered 0 through 3 (4 steps).

Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
	11:00 a.m. - Begin Step 1 at MW-6D at 10 gpm. 12:00 (noon) - Begin Step 2 at MW-6D at 12 gpm. 13:00 - Begin Step 3 at MW-6D at 14 gpm. Sample influent to treatment system for field GC and lab analysis. 14:00 - End of Step Test. Set pump rate to 8 to 14 gpm (depending on drawdown) for Monday's test. Turn pump off. Record recovery. Sample treatment effluent for field GC and lab analysis. 15:00 - End of recovery data collection. Remove/download data recorders. Collect water-level measurements at data logger locations. 16:00 - 17:00 - Collect complete round of water-levels. Reset data recorders; linear scale, 30 minute intervals for pre-pumping measurements over Saturday and Sunday.
Thurs., Nov. 5, 1992 C. Moffatt R. Ponciano D. McGregor Soil Tech	7:30-8:30 - Collect complete round of water-levels. 8:30-9:30 - Reset data recorders for delayed start at 10:00 a.m., log cycle intervals not exceeding 5-minute intervals. 10:00 (or a few seconds after 10:00) - Start 72-hour continuous rate pumping test at MW-6D. Pump rate (between 8 to 14 gpm) should be preset based upon Friday's step test. Take manual measurements at pumping well for plotting of data. 11:30 - Sample influent to treatment system for field GC and lab.

Table 1. Anticipated Schedule for Pumping Tests, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date and Personnel	Action
	12:00 - Sample effluent for field GC and lab. Continue to collect influent and effluent samples for field GC every 2 hours. Measure complete round of water-levels (including data recorders with drop pipes and non-date recorder locations) on an hourly basis until 14 hours (12:00 midnight) into pump test. After 14 hours, measure complete rounds every 2 hours.
Fri., Nov. 6, 1992 C. Moffatt R. Ponciano A. Colberg D. McGregor Soil Tech	10:00 - Twenty-four hours into test. Sample influent and effluent for field GC and lab analysis. Evaluate data plotted from pumping well for delayed yield. If delayed yield is not present, stop test and record recovery. If possible, have recorder start new step just prior to turning pump off.
Sat., Nov. 7, 1992 C. Moffatt R. Ponciano D. McGregor Soil Tech	10:00 - Fourty-eight hours into test. Sample influent and effluent for field GC and lab analysis. If delayed yield is not present, stop test and record recovery.
Sun., Nov. 8, 1992 C. Moffatt R. Ponciano D. McGregor Soil Tech	10:00 - Seventy-two hours into test. Sample influent and effluent for field GC and lab analysis. Stop test and record recovery.

#PR01301-wp3/102692.tbl

TUT 003 1545

GERAGHTY & MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

October 23, 1992

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

Re: Four Winds Plaza Monitoring Well Access
Tutu Service Station Investigation
St. Thomas, U.S. Virgin Islands

Dear Mr. Kwan:

As we discussed in our recent telephone conversation, Geraghty & Miller, Inc. is interested in receiving access to the monitoring wells installed by Caribbean Hydro-Tech, Inc. (CHT) at Four Winds Plaza (see Figure 1) for the upcoming pumping tests. Although it is not required to monitor these wells in the Tutu Service Station Investigation Work Plan prepared by Geraghty & Miller, Inc., March 1992, they will provide more water-level measuring points. Using more measuring points will provide better data for evaluation of aquifer hydraulic properties. The proximity of Monitoring Well CHT-6D and CHT-4 to the proposed pumping wells (i.e., MW-6 and MW-6D) would provide an excellent addition to the data.

Geraghty & Miller appreciates your help in gaining access to these wells. If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Clinton Moffatt
Staff Scientist

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman
Vice President/Project Officer

c: Ana Gloria Ramos - TEIC

CM:cmw
#PR01301-wp3/102192.ltr

TUT 003 1546

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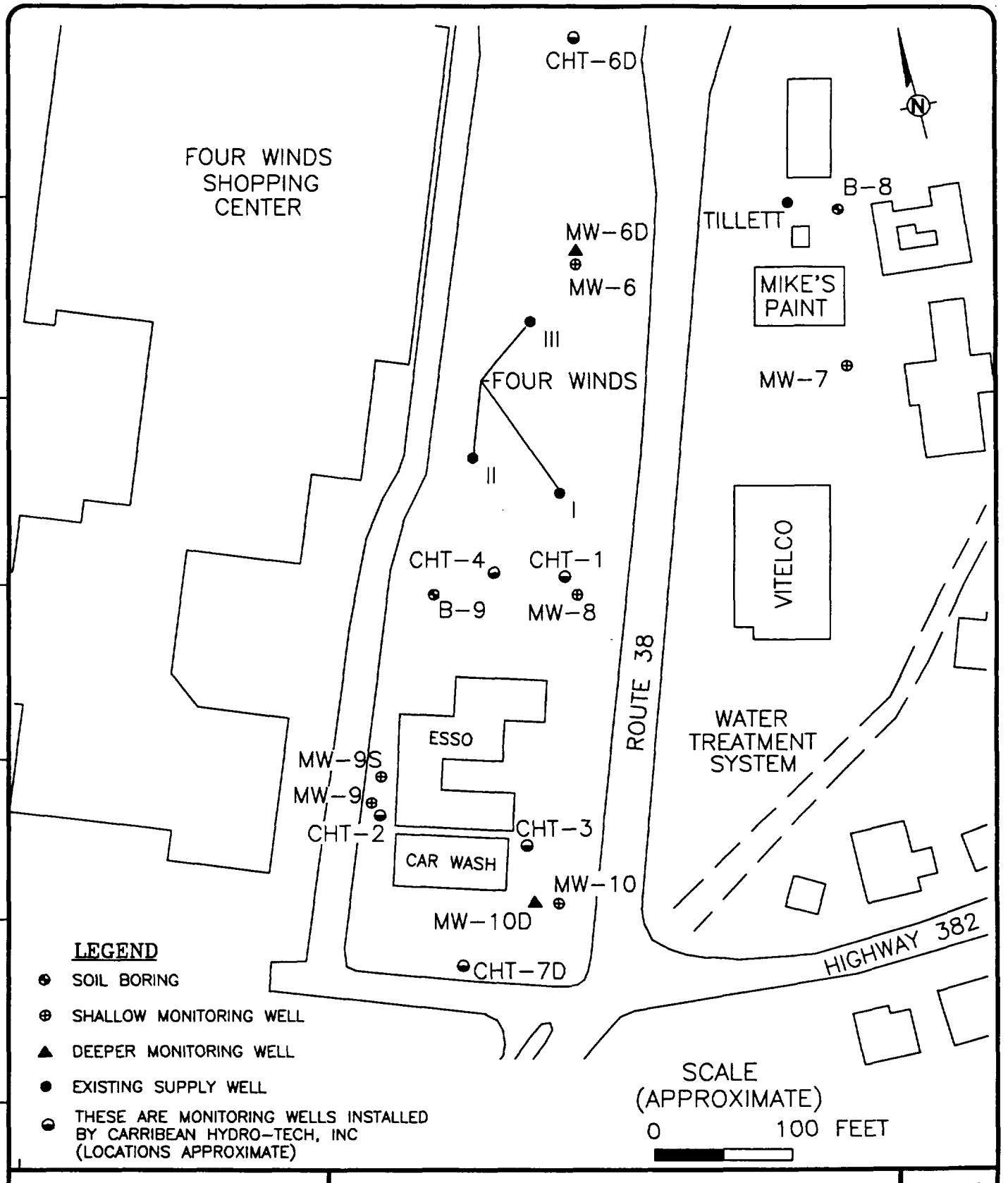

DRAFTER: M. NIXON | APPROVED: T. DANAHY | CHECKED: C. MOFFAT | DRAWING: TU-66 | FILE NO.: TU-66 | PRJCT NO.: PR01301 | DWG DA( )-22-92

GERAGHTY & MILLER, INC.
Environmental Services

PUMPING TEST PIPING LAYOUT

TUTU SERVICE STATION INVESTIGATION
ST. THOMAS, U.S. VIRGIN ISLANDS

FIGURE

TUT 003 1547

GERAGHTY & MILLER, INC.
Environmental Services

Ground Water Engineering Hydrocarbon Remediation Education

October 20, 1992

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

Re: Relocation of Pumping Tests and Revised Schedule
Tutu Service Station Investigation
St. Thomas, U.S. Virgin Islands

Dear Ms. Kwan:

Based on information collected from the first round of ground-water sampling of the monitoring wells, Geraghty & Miller, Inc. has decided to relocate the upcoming pumping tests from MW-10 and MW-10D to MW-6R and MW-6D. During the purging of MW-10, the well was pumped dry within 12 minutes at a rate of 2 gallons per minute (gpm) and MW-10D was pumped dry within 25 minutes at a rate of 8 gpm. In comparison, MW-6R and MW-6D maintained a flow rate of 4 gpm and 8 gpm, respectively, therefore providing a sufficient yield for the pumping tests.

Table 1 presents an update of the preliminary schedule for the pumping tests. As requested by the USEPA and agreed to by Ana Gloria Ramos, Designated Coordinator, Tutu Environmental Investigation Committee, the current schedule includes an extension of the pumping test at the deep monitoring well (MW-6D) to possibly 72 hours, in order to allow for stabilization after potential delayed yield. The 72-hour pumping test will be stopped after 24 or 48 hours if the data indicates that a delayed yield is not still present. The field data will be

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GERAGHTY & MILLER, INC.

plotted for review by USEPA representatives prior to deciding when to end the test. If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Clinton Moffatt
Staff Scientist

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman TVD
Daniel A. Nachman
Project Director/Project Officer

c: Ana Gloria Ramos - TEIC
Jose Agrelot - Soil Tech
Sally Odland - CDM

CM:cmw
#PR01301-wp3/101392.1.TR

Table 1. Anticipated Schedule for Pumping Tests in October and November 1992, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date	Activity
Thursday, October 29	Set-up water-level recorders for pre-pumping trend.
Friday, October 30	4-hour step-test at MW-6D; record recovery. Set-up recorder for pre-pumping trend for November 2 test.
Monday, November 2 @ 10:00 a.m.	Start 72-hour pumping test at MW-6D; pumping rate to be determined from the results of October 30 step-test.
Thursday, November 5 @ 10:00 a.m.	End test; record recovery; data analysis.
Friday, November 6	4-hour step-test at MW-6R; record recovery. Set-up recorder for pre-pumping trend for November 9 pumping test.
Monday, November 9 @ 10:00 a.m.	Start 24-hour pump test at MW-6R; pumping rate to be determined from November 6 step-test.
Tuesday, November 10 @ 10:00 a.m.	End test; record recovery.

PR01301-#3/91492tbl.wk3

GERAGHTY & MILLER, INC.
Environmental Services

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October 27, 1992

Leonard Reed
Department of Planning and Natural Resources
45A Estate Nisky, Suite 231
St. Thomas, U.S. Virgin Islands 00802

Re: Tutu Aquifer Pumping Tests
St. Thomas, U.S. Virgin Islands

Dear Mr. Reed:

This letter provides an update of the Geraghty & Miller, Inc. letter to Commissioner Roy E. Adams dated September 18, 1992, regarding the request of the Department of Planning and Natural Resources (DPNR) assistance for the temporary shut-down of active supply wells in the Tutu area during the aquifer pumping tests.

Geraghty & Miller has determined that the only supply wells that may influence the aquifer pumping tests are the Four Winds Plaza Wells (Four Winds I, Four Winds II, Four Winds III). Geraghty & Miller has made arrangements with Four Winds Plaza to shut down their supply wells during the aquifer testing. It is our understanding that other supply wells that would potentially impact our pumping tests (i.e., the Tillett and Eglin Wells) are not currently active. Therefore, it will not be necessary for the DPNR to contact any supply well owners.

In addition, the aquifer pumping test schedule (attached) has been revised which includes an extension of the November 2, 1992 pumping test from 24 hours to 72 hours, as required by the U.S. Environmental Protection Agency (USEPA).

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We appreciate your cooperation in the ongoing investigation in the Tutu area. If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Clinton Moffatt /TDR

Clinton Moffatt
Staff Scientist

Thomas V. Danahy

Thomas V. Danahy
Senior Scientist/Project Manager

Arnold S. Nemickas for

Daniel A. Nachman
Vice President/Project Officer

c: Ana Gloria Ramos - TEIC
Caroline Kwan - USEPA
Jose Agrelot - Soil Tech
Commissioner Adams - DPNR

TVD:cmw
#PR01301-wp1/102392.ltr

GERAGHTY
& MILLER, INC.
Environmental Services

Ground Water *Engineering* *Hydrocarbon* *Remediation* *Education*

September 18, 1992

Commissioner Roy E. Adams
Department of Planning & Natural Resources
45A Estate Nisky, Suite 231
St. Thomas, U.S. Virgin Islands 00802

Re: Active Supply Wells in the Tutu Area
St. Thomas, U.S. Virgin Islands

Dear Commissioner Adams:

The Tutu Environmental Investigation Committee (TEIC), which is comprised of Texaco Caribbean, Inc. (Texaco) and Esso Virgin Islands, Inc. (Esso), is currently conducting a soil and ground-water investigation in the Tutu area, Anna's Retreat, St. Thomas, U.S. Virgin Islands. TEIC retained Geraghty & Miller, Inc. to prepare and implement a work plan which was developed to be incorporated as part of the Administrative Order by Consent issued by the United States Environmental Protection Agency (USEPA), Region II, pursuant to Subtitle I of the Resource Conservation and Recovery Act (RCRA).

On behalf of Ana Gloria Ramos, Designated Coordinator for the TEIC, Geraghty & Miller would like to request your assistance in temporary shut-down of active supply wells in the Tutu Area. As part of the USEPA-approved work plan Geraghty & Miller will be performing two 4-hour variable rate step tests and two 24-hour constant rate pumping tests in monitoring wells in the Tutu area to determine aquifer characteristics. The proposed dates for the pumping tests are indicated on Table 1. This work is being coordinated with the USEPA and the Department of Planning and Natural Resources (DPNR).

Geraghty & Miller will be collecting continuous, long-term water level data over the next few weeks to determine the impact of the supply wells currently pumping in the Tutu area. If nearby pumping wells are impacting ground-water levels in the study area, Geraghty & Miller

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will notify the well owners 48 hours in advance and request that the supply wells be temporarily shut down during the pumping tests. The following supply wells may impact the pumping tests: Eglin I, Eglin II, Eglin III, Four Winds I, Four Winds II, and Four Winds III. The locations of these wells are shown on Figure 1. Since the DPNR is the agency authorized to regulate and permit ground-water usage, it may be necessary for the DPNR to interact with the well owners to provide their cooperation; otherwise it may not be possible to obtain useful data from the pumping tests.

Any assistance you can provide on this matter will be greatly appreciated. If you have any questions, please call Michael Reive or Thomas Danahy at (201) 909-0700. We will keep you updated on this matter.

Sincerely,

GERAGHTY & MILLER, INC.

Michael D. Reive
Scientist

Thomas V. Danahy
Senior Scientist/Project Manager

Daniel A. Nachman
Vice President/Project Director

c: Ana Gloria Ramos, TEIC
Caroline Kwan, USEPA
Leonard Reed, DPNR
Jose Agrelot, Soil Tech

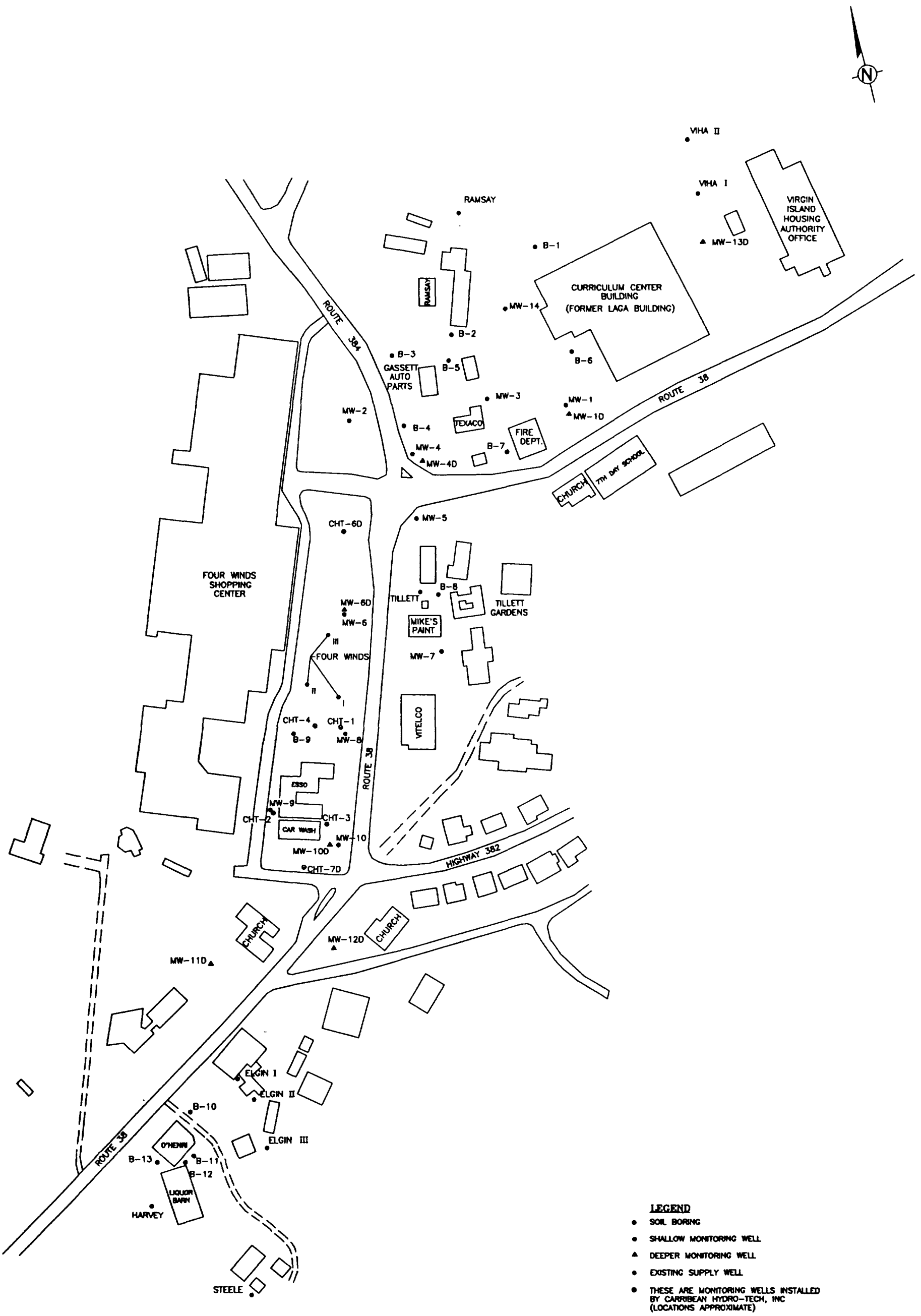
TVD:jmh:cmw:mtb:rma
#PR01301-wp3/090392.LTR

Table 1. Anticipated Schedule for Pumping Tests in October and November 1992, Tutu Service Station Investigation, St. Thomas, U.S. Virgin Islands.

Date	Activity
Thursday, October 29	Set-up water-level recorders for pre-pumping trend.
Friday, October 30	4-hour step-test at MW-9 or MW-10; record recovery. Set-up recorder for pre-pumping trend for November 2 test.
Monday, November 2 @ 10:00 a.m.	Start 24-hour pumping test at MW-9 or MW-10; pumping rate to be determined from the results of October 30 step-test.
Tuesday, November 3 @ 10:00 a.m.	End test; record recovery; data analysis.
Friday, November 6	4-hour step-test at MW-10D; record recovery. Set-up recorder for pre-pumping trend for November 9 pumping test.
Monday, November 9 @ 10:00 a.m.	Start 24-hour pump test at MW-10D; pumping rate to be determined from November 6 step-test.
Tuesday, November 10 @ 10:00 a.m.	End test; record recovery.

PR01301-#3/91492tbl.wk3

DWG D. 02JUNE92	PRJCT NO.: PR01301	FILE NO.: -	DRAWING: TU-2	CHECKED: MOFFATT	APPROVED: DANAHY	DRAFTER: NI



GERAGHTY & MILLER, INC.
Environmental Services

SITE PLAN

TUTU SERVICE STATION INVESTIGATION
ST. THOMAS, U.S. VIRGIN ISLANDS

FIGURE 1

TUT 003 1556

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

EMERGENCY AND REMEDIAL RESPONSE DIVISION

FACSIMILE REQUEST AND COVER SHEET

TO: Ana Gloria

OFFICE/PHONE: _____

FAX NUMBER: (809) 782-5067

FROM: Caroline Kwan

PHONE: 212 264-0151

FAX NUMBER: 212 264-6192

DATE: 10/29/92

NUMBER OF PAGES TO FOLLOW COVER SHEET: 1
(Please number all pages)

REQUEST CONFIRMATION OF RECEIPT OF FAX: YES_____ **NO**____

NOTES/COMMENTS:

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

JOHN K. DEMA

CARLY-ANNE MOODY

29 October 1992

VIA FACSIMILE TRANSMISSION
(212) 264-8192

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

Re: Four Winds Plaza Monitoring Well Access
Tutu Service Station Investigation
St. Thomas, U.S. Virgin Islands

Dear Ms. Kwan:

As we discussed on October 27, 1992, TEIC has requested permission to use two monitoring wells installed by CHT at Four Winds Plaza. Please be advised that we have no objection to the use of these wells (CHT-6D and CHT-4) with the understanding that they will be used by TEIC for water level measurements only during the pumping tests scheduled to be completed at 10:00 a.m. on Tuesday, November 10, 1992. I have instructed my staff to make arrangements for personnel to be on site to facilitate the access of these wells.

If we wish to use TEIC's wells for the same purpose during our pump test scheduled for later in November, I will notify you well enough in advance to allow TEIC to make similar arrangements to schedule personnel to be at Four Winds.

If I have neglected to address any details regarding TEIC's access to the wells, please do not hesitate to call my office.

Thank you for your phone call and I look forward to meeting with you and Andy on November 19th.

Sincerely,

John K. Dema, Esquire
(Dictated but not read)

JKD/s
cc: Andy Praschak, Esquire - EPA/CFC
(Via Facsimile Transmission - (806) 729-7748)

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