

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

ENVIRONMENTAL PROTECTION  
AGENCY, REGION II

1993 MAR -2 PM 12: 3  
JOHN K. DEMA  
CAREY-ANNE  
ERRD SITE COMPLIANCE  
BRANCH

1 March 1993

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

Andy Praschak, Esquire  
Assistant Regional Counsel  
USEPA - Caribbean Field Office  
1413 Fernandez Juncos Avenue  
Santurce, PR 00909

Re: Response of Four Winds Plaza Partnership to Request  
for Information pursuant to §§104(e)(1) and 104(e)(2) of CERCLA

Dear Ms. Kwan and Atty. Praschak:

Four Winds Plaza Partnership is submitting concurrently with this letter its confirmed responses to the Request for Information associated with the investigation being conducted by EPA/DPNR into the contamination of the Tutu well field on St. Thomas, U.S. Virgin Islands.

Since the definition of "facility" under the Request for Information is inclusive of all tenants at Four Winds Shopping Center since the date of construction, Four Winds is presently in the process of attempting to interview past tenants who were active in this location prior to the formation of Four Winds Plaza Partnership and its purchase of the shopping center in September of 1985 and who may have information responsive to certain of the requests for information.

Additionally, Four Winds is in the process of compiling and excerpting those documents and deposition testimony which it feels may be responsive to certain of the information requests.

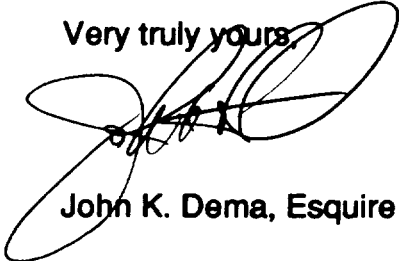
The information responses sent today reflect our best efforts to date to respond as completely as possible. Four Winds respectfully requests an additional thirty-day extension within which to further respond with supplementation of the materials forwarded to EPA today. These supplementary responses will include further information solicited from the tenant population, past and present, as well as exhibits containing documents responsive to the requests.

In its initial response, Four Winds has attached diagrams of the cistern, sewer, plumbing, sinks and floor drains including outfalls and discharges.

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

We thank you for your consideration of this request to extend the period of time within which to respond for an additional thirty days.

Very truly yours,

A handwritten signature in black ink, appearing to read "John K. Dema", is written over the closing "Very truly yours,". The signature is stylized and somewhat cursive.

John K. Dema, Esquire

JKD/lj

cc: Quincy Development Corporation

ENVIRONMENTAL PROTECTION  
AGENCY, REGION II

1993 MAR -2 PM 12: 14

ERRO SITE COMPLIANCE  
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ATTACHMENTS

DIAGRAMS

<u>SHEET NO.</u>	<u>DESCRIPTION</u>	<u>DATE</u>
R-1	CISTERN FOUNDATION PLAN	8/29/77
R-2	REVISED PUEBLO POWER PLAN	6/15/78
R-3	REVISED "MINI MALL" FLOOR PLAN	4/25/79
R-4	REVISED THEATER FLOOR PLAN	8/1/78
COVER SHEET	PIRATES PLAZA SHOPPING CENTER	8/23/77
P-1	SITE WATER & SEWER DISTRIBUTION	8/23/77
P-2	GROUP 1 WATER & SEWER DISTRIBUTION	8/23/77
P-3	OFFICE & PROJECTION ROOM WATER & SEWER DISTRIBUTION	8/23/77
P-4	GROUP 2 WATER & SEWER DISTRIBUTION	8/23/77
P-5	"BARKERS" WATER & SEWER DISTRIBUTION	8/23/77
P-6	GROUP 4 WATER & SEWER DISTRIBUTION	8/23/77
P-7	"PUEBLO" PLUMBING PLAN	8/23/77
A-3	GROUP 2 (WESTERN AUTO) FLOOR PLAN	8/23/77
A-13	"PUEBLO COLD BOX AND TRENCH PLAN	8/23/77
A-14	"PUEBLO" COLD BOX TRENCH DETAILS	8/23/77

**FOUR WINDS PLAZA PARTNERSHIP'S RESPONSE**  
**TO**  
**REQUEST FOR INFORMATION**

ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
1993 MAR -2 PM 12: 14  
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1. Were, or are, any hazardous substances or substances containing hazardous substances or compounds ever used, stored, generated, disposed of or otherwise handled at the facility, including but not limited to products containing 1,1,1-trichloroethane, trichloroethylene ("TCE"), 1,2 trans-dichloroethylene ("DCE"), tetrachloroethylene ("PCE"), and methyl-ethyl-ketone ("MEK")? Identify each hazardous substance by providing the name, composition and source of origin of each substance.

**RESPONSE**

Four Winds has not yet received information from all tenants indicating whether they have ever stored, generated or disposed of hazardous substances. However, Four Winds has reason to believe that one Tenant, Western Auto, used an aerosol solvent as part of its maintenance/repair operation. This operation was apparently curtailed in approximately 1981 when Western Auto's repair/maintenance operation was limited to tire and battery replacements. Unfortunately, neither the commercial name nor the chemical composition of all solvents has been determined. Four Winds intends to pursue this information and intends to provide a more complete answer in a supplemental response.

In addition, Western Auto runs a retail operation with a significant number of products in its inventory. Since many of these products are automotive in nature, it is likely that numerous products may contain hazardous substances or compounds. Four Winds intends to provide more details in a supplemental response.

With respect to other tenants' and Four Winds, the information below has been compiled from interviews completed to date of

tenants and Plaza management personnel. Unless otherwise noted, the products listed below contain ingredients identified on the "Sequential CAS Registry Number List of CERCLA Hazardous Substances".

Tenant: Splash and Dash Car Wash

Product: Luminox (Dilution Use: 4:1)  
Manufacturer: Selig Chemical Industries  
Hazardous Ingredients:  
1. HYDROFLUORIC ACID 7664393 2-4%  
2. SULFURIC ACID 7664939 18-25%

Product: SC-200  
Manufacturer: Spartan Chemical Co., Inc.  
Hazardous Ingredients:  
2. SODIUM HYDROXIDE 1310732 4%

Western Auto

The following information has been compiled from depositions of Western Auto personnel and may be representative of the type of product used by may not necessarily represent the specific product.

Product: Brake Cleaner (Aerosol)  
Manufacturer: Radiator Specialty Co.  
Hazardous Components:  
1. METHYL CHLOROFORM 71556 30-70%  
2. PERCHLOROETHYLENE 27184 30-70%  
3. CARBON DIOXIDE PROPELLANT 124389

Product: Brake Cleaner TM-1807  
Manufacturer: Aerosol Systems, Inc.  
Hazardous Components:  
1. 1,1,1 TRICHLOROETHANE 71556 47%  
2. PERCHLOROETHYLENE 127184 50%  
3. CARBON DIOXIDE 124389 3%

Product: Lectra Motive Cleaner (aerosol)  
Manufacturer: CRC Chemicals  
Hazardous Components:

1. 1,1,1 TRICHLOROETHANE	71556	89.2%
2. DIETHYLENE ETHER	123911}	
3. METHYL BUTYNOL	115195}	<6.8%
4. SEC. BUTYL ALCOHOL	78922 }	
5. CARBON DIOXIDE	124349	4.0%

Product: Universal Cement  
Manufacturer: Camel Tire Care Products  
Hazardous Ingredient:

1. 1,1,1 TRICHLOROETHANE	71556	95.5%
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Product: Solder Seal/Gunk Disc Brake Quiet (Aerosol)  
Manufacturer: Radiator Specialty Company  
Hazardous Component:

1. METHYLENE CHLORIDE (A)	75092	APPROX. 60%
2. METHYL ETHYL KETONE	78933	APPROX. 5%
3. PROPANE	74986	APPROX. 21%

In addition, Western Auto may have sold and/or used the following products that may contain hazardous ingredients for which no other information has yet been obtained:

- Gunk Disc Brake Quiet
- Gunk Liquid Wrench
- WD 40
- Simple Green Cleaner
- Blue Coral Floor Cleaner
- Oil-Dri Floor Absorbent
- Camel Tire Cement
- Ru-Glyde II
- Electro Lite Acid
- Lan-Lin Hand Cleaner

2. For each hazardous substance identified above, please provide a summary describing how each substance was treated, handled, transported, stored and/or disposed of by the facility. Please attach any manifests, invoices and other documentation which relate to the treatment, handling, transportation, storage and/or disposal of each substance. If you are unable to provide a copy of

any such document, please describe the document and explain why it cannot be provided.

**RESPONSE**

Those products identified above and used by Splash and Dash Car Wash are stored in the utility room located on the first floor of the car wash building. These products are used in the course of routine operation of the car wash and auto detailing and handled in accordance with product information and instructions. Luminox is delivered to the facility by common carrier in 55 gallon drums. Before use it is diluted with water by a factor of 4:1. Once the product has been used in the car wash/auto detailing procedure, the used car wash water is reclaimed and, pursuant to the direction of the VI Public Works Department, discharged to the sanitary sewer. No other treatment, handling, transportation, storage and/or disposal of the products is performed.

This response will be supplemented with additional information regarding use of SC-200.

Most of the Western Auto products were used in conjunction with a light mechanical repair/maintenance operation conducted between 1978 and 1982. Some of the products may still be used in conjunction with a tire and battery replacement business still conducted at Western Auto. Sworn testimony indicates that any excess of these materials was wiped up with rags which were then placed into a commercial dumpster for disposal in Bovoni landfill, St. Thomas.

3. Are, or were, mechanic repairs, including oil changes performed at the facility? Please describe what type of repairs were performed, if any, and the frequency of such repairs.

**RESPONSE**

The only tenant to perform mechanic repairs, including oil changes, at Four Winds Plaza has been Western Auto. Upon information and belief, Western Auto opened its store at Four Winds in late 1978 or early 1979 and performed light mechanical repair/maintenance including oil changes as well as tire and battery replacement. These activities continued until 1981 or 1982 when all maintenance and repair function ceased except for tire and battery replacement. The repair and maintenance activities performed at Western Auto apparently included engine tune-ups and brake jobs as well as oil changes.

In a survey conducted in early 1981 by Envirodyne Engineers Inc. for the Government of the Virgin Islands, Western Auto is reported to have generated 50 gallons of waste oil and 20 gallons of hydraulic fluids per month. No other documents have been produced to Four Winds Plaza Partnership to indicate the frequency of other repair and maintenance activities conducted at Western Auto. Four Winds will continue to collect information response to this request and will supplement this answer.

4. If the answer to question 3 above is yes, were any hazardous substances, substances containing hazardous substances or compounds, or hazardous wastes generated, treated, stored, disposed of or otherwise handled in the process?



**RESPONSE**

Information obtained to date, including a preliminary laboratory analysis of the Western Auto waste oil indicates that the waste oil has not been adulterated and we believe that it does not possess the characteristics set by RCRA for hazardous wastes. As for the other products, information obtained through depositions of various Western Auto personnel indicates that during the routine use of those products in the Western Auto service bays, rags and oil absorbent used in wiping up excess oil was disposed as trash into a commercial dumpster for eventual disposal in the Bovoni landfill, St. Thomas.

5. If the answer to question 4 above is yes, please list and/or describe what kinds of substances were used. In addition, please describe where and how these substances were stored at the facility prior to their use, and all disposal practices regarding these solvents. Please attach any manifests, invoices and other documentation which relate to this question. If you are unable to provide a copy of any such document, please describe the document and explain why it cannot be provided.

**RESPONSE**

Please refer to responses to Questions 1,2,3 and 4. In addition, Four Winds will attempt to provide further information in its supplemental response.

6. If oil changes were conducted at the facility, please give an annual summary explaining how the used oil was disposed of, the quantity disposed of per month and any and all analysis of this used oil. Please provide all appropriate documentation. If such document

is not available, please describe the document and explain why it cannot be provided.

**RESPONSE**

According to the deposition testimony of Charles Frazer, Western Auto would call HMS Systems who would send out a truck to pump out the waste oil tank. Mr. Frazer testified that the waste oil was removed only twice since 1979. No other documents or information responsive to this request have been located.

7. Is there, or has there been, any oil water separators or used oil storage tanks at the facility? If the answer is yes, please describe the structure and location of each such unit at the facility and explain its use. Include units which have been removed and /or shut down. Please attach a diagram or drawing of these units, the dates of their use and their location.

**RESPONSE**

**A. Oil Water Separators**

On Sheet P-4 of the attached set of diagrams, an oil water separator is shown to be located on the northern end of the Western Auto service bays. Initial investigations by Four Winds have not revealed the actual location of the oil water separator as depicted in the diagram on Sheet P-4. It is not known to Four Winds if the oil water separator was, a) installed in the depicted location and then removed or filled in, b) located in an area of Western Auto not shown in the diagram, or c) never installed. Four Winds has exhaustively searched all locations under its control and has not been able to locate any additional documentation pertaining to the oil/water separator.

However, during discovery in the Tutu Wells Contamination Litigation, the following has been learned during depositions:

- Nicholas Crowder, Store President, Western Auto St. Thomas since 1985

Q: Do You know if there is an oil separator currently in the service area?

A: To my knowledge, no.

Q: Do you know if there's an oil -- if there was ever an oil separator in the area shown by this circle in the drawing--

A: I do not know.

Q: Exhibit No. 5?

A: I do not know, I do not know if there was one. I've never heard them referred to as an oil separator.

[Deposition of Nicholas Crowder, 11/9/92, page 112 lines 16-25, page 113, line 1.]

- Charles Frazer, employed at Western Auto, St. Thomas since April 1979.

Q: Okay. There was -- where's the drawing with the oil/water separator? Do you know anything about an oil/water separator being located in there?

MR. SANFORD: Located where?

BY MR. COLE:

Q: Showing you what has been marked as Exhibit No. 5 to the Crowder deposition, in the service area of the Western Auto store, back in this area, there is something marked as an oil separator and floor drain. Do you see that?

A: Yes: I don't know anything about that though.

Q: Have you ever -- were you aware or have you ever been told that there was an oil separator located in that service bay?

A: No, never.

[Deposition of Charles Frazer, 11/9/92, Page 24, lines 4-20.]

- Clifford Brown, mechanic, Western Auto, St. Thomas 1979-1980.

Q: All right. Thank you. Do you ever know -- did you know there to be an oil/water separator in the, over in this area of the shop over here?

A: Not that I know.

[Deposition of Clifford Brown, 1/12/93, page 31, lines 12-16.]

#### B. Used Oil Storage Tank

On sheet A-3 of the attached diagrams, Western Auto's waste oil tank and associated piping is depicted to be located just west of the ramp leading to the service bays of Western Auto. During late November, and early December 1992, Four Winds hired a Consultant to attempt to ascertain, as suggested by representatives of US EPA on 11/19/92, and under the direct supervision and direction of DPNR, the location, size and contents of the Western Auto's two UST's including the used oil tank. (See attached reports from Caribbean Hydro-Tech, Inc. to Clifford Crooke)

A file search revealed that Western Auto, as owner/operator of this UST, had never filed a UST Notification Form. Four Winds then served notice on Western Auto that this violation put their lease at Four Winds Plaza in jeopardy. In February 1993, Western Auto

complied and submitted the UST Notification Form. (See Attached). As of this date, Western Auto has not produced any documents that detail the size of the tank, the date of installation, or the type of construction.

Through deposition testimony, the following has been elicited from various deponents:

- Charles Frazer, employed at Western Auto, St. Thomas since April 1979.

Q: Okay. do you know when -- when did they stop using that waste oil tank?

A: That's before Mr. Crowder came, so it's about 11 years.

Q: Eleven years ago?

A: Yes, because that's before Mr.. Crowder came there.

Q: So about in 1981?

A: Something like that, yes.

Q: Okay. Do you know why they stopped doing oil changes?

A: Yes, because the shop more or less -- they took out three of the bays, so all we were doing was tire installation. That's all.

[Deposition of Charles Frazer, 11/9/92, page 20, lines 9-22.]

Q: Well, how was that underground waste oil tank used? I mean, if they drained the oil out of a crankcase there in the service area --

A: They use a pan. We had a big pan on wheels, and they would take it from the car to the drain --to the tank.

Q: Okay.

A: They use a spout and a facet(sic), and they put it in the tank.

[Deposition of Charles Frazer, 11/9/92, Page 25, Lines 8-16]

Q: Okay. So people would pour the water -- pour the oil right down into the tank --

A: Yes, um-hum.

[Deposition of Charles Frazer, 11/9/92, Page 26, Lines 8-10]

Q: Did you ever arrange for the disposal of any of the waste oil from this tank?

A: Yes.

Q: Who did you deal with when you --

A: HMS Systems

Q: And is there a person there that you used to deal with?

A: I don't know the name. We would just call the company and they would send the truck out.

Q: Okay. How often back then when you were doing oil changes would they pump that out?

A: Twice when I were there; that's the only time that I could remember.

[Deposition of Charles Frazer, 11/9/92, Page 39, Lines 13-25]

8. By what means could hazardous substances such as PCE, DCE and TCE enter the units identified in the response to question 7 at such facility? Please be specific, and explain all possible means.

**RESPONSE**

At this time, Four Winds has no information responsive to this request. The results of laboratory testing do not disclose any substances such as PCE, DCE, and TCE to be present in the soil immediately adjacent to these units. Four Winds will attempt to discover information and if successful will supplement this response.

9. Have, or were the units identified in the response to question 7 periodically cleaned out or emptied, either completely or partially? If so, how often and on what occasions?

**RESPONSE**

No documents response to this request have been discovered. However, Charles Frazer has testified in deposition that Western Auto arranged for HMS Systems to pump out the waste oil tank on two occasions. Q: Did you ever arrange for the disposal of any of the waste oil from this tank?

A: Yes.

Q: Who did you deal with when you --

A: HMS Systems

Q: And is there a person there that you used to deal with?

A: I don't know the name. We would just call the company and they would send the truck out.

Q: Okay. How often back then when you were doing oil changes would they have to pump that out?

A: Twice when I were there; that's the only time that I could remember.

[Deposition of Charles Frazer, 11/9/92, Page 39, lines 13-25]

10. If the answer to question 9 above is yes, please explain how the removed liquids and/or sludges are or were handled and disposed of. Please include any sampling procedures

**RESPONSE**

See the response to Question No. 9 above.

11. Identify the location of each of the following on a plot plan of the facility, to scale, if available:

a. all in use or out of use septic tanks, sewer connections and associated piping;

**RESPONSE**

Four Winds has no knowledge of any septic tanks, either in use or out of use, located on its property.

Please refer to Sheet P-1 of the attached diagrams for sewer connections and associated piping. Four Winds will supplement this response with sewer connections for more recent construction including the car wash, the addition on the south side of the Plaza and the addition in the Courtyard.

b. all outfalls and discharges;

**RESPONSE**

Please refer to Sheet P-1 of the attached diagrams for the location of the following (not necessarily depicted to scale);

- Two discharges, one approx. 4" and the second approx. 3", originating from the Esso Tutu waste oil system at the west side of Esso Tutu to the parking lot at Four Winds.

- Numerous scupper like discharges along the north, west and south walls of Esso Tutu discharging to the Four Winds parking lot.



- Overflows from the Four Winds cistern.
- Pursuant to the directions of DPNR, the air conditioning units located on the roof of Four Winds Plaza use PVC pipe to channel the condensation away from the roof and onto the Four Winds parking lot at the rear of the Plaza.

- Pursuant to the directions of DPNR, sections of the roof that may need additional applications of Topcoat liquid roofing are cut-off from the water collection system and the cistern. This rain water is then drained from the gutters onto the parking lot at the rear of the Plaza.

This response will be supplemented with information pertaining to any discharges and outfalls that may exist for the more recent construction at Four Winds including the car wash, the new addition at the south end of the plaza and the new construction in the courtyard.

c. all underground storage tanks either in use or out of service;

**RESPONSE**

WESTERN AUTO:

- **Underground Diesel Storage Tank**
  - Status: Out Of Service
  - Size: approx. 4-5 ft .in diameter and 15-20 ft. long
  - Location: On the west side of Four Winds Plaza adjacent to the entrance to the service bays at Western Auto.

Installation: No documents have been located that indicate the date of installation, repair, replacement, and/or maintenance of this tank. Tank was

installed prior to the purchase of the shopping center by Four Winds in September 1985.

- **Underground Waste Oil Storage Tank**
  - Status: Out Of Service
  - Size: approx. 3 ft. in diameter and 5-6 ft. long.
  - Location: On the west side of Four Winds Plaza adjacent to the entrance to the service bays at Western Auto.

**Installation:** No documents have been located that indicate the date of installation, repair, replacement and/or maintenance to this tank. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985.

## PUEBLO

Please refer to Sheet R-2 on the attached diagrams. In this revised Pueblo power plan a 285 gallon UST is depicted. File searches, and site inspections have revealed no evidence that this tank was installed. However, site inspections at the rear of the Pueblo facility indicate that the naturally occurring rock formations may have made it impractical for the tank to be placed underground. Interviews are being conducted with Pueblo personnel and any additional information will be supplemented in a subsequent response.

No other underground tanks are know or suspected to exist.

d. the former location of all underground storage tanks that have been removed.

**RESPONSE**

No former locations of underground storage tanks are known or suspected to exist.

e. all floor drains, roof catchment drains, sewers, sinks and associated piping.

**RESPONSE**

For floor drains, sewers, sinks and associated piping, please refer to the following diagrams:

Sheet R-3,

Sheet R-4,

Sheet P-1,

Sheet P-2,

Sheet P-3,

Sheet P-4,

Sheet P-5,

Sheet P-6,

Sheet P-7,

Sheet A-3,

Sheet A-13,

Sheet A-14.

This response will be supplemented with information concerning the location of roof catchment drains since diagrams responsive to this request do not presently exist. Four Winds will also supplement this response by providing diagrams for the more recent construction including the car wash, the addition at the south end of the Plaza and the construction in the Courtyard.

f. all on site areas where hazardous wastes, regulated substances or hazardous substances are or could have been used, stored and disposed of;

**RESPONSE**

Western Auto

Refer to Sheet P-4 and Sheet A-3

This response will be supplemented with diagrams of the car wash and any additional information that is responsive from the completion of tenant interviews.

g. all above-ground tanks;

**RESPONSE**

In a supplemental response to this question, Four Winds will supplement this response with a diagram locating the following:

**Pueblo:**

- Above Ground Diesel Tank  
Status: In Service  
Size: Approximately 200 gallons  
Location: Behind Pueblo on the west side of Four Winds Plaza

Installation: No documents have been located that indicate the date of installation, repair, replacement, and/or maintenance to this tank. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985.

- Above Ground Diesel Tank  
Status: In Service  
Size: Approximately 500 gallons  
Location: Behind Pueblo on the west side of Four Winds Plaza

**Installation:** No documents have been located that indicate the date of installation, repair, replacement and/or maintenance to this tank. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985.

**Western Auto:**

- Above Ground Diesel Storage Tank
  - Status: In Service
  - Size: Approximately 55 gallons
  - Location: Behind Western Auto against the west wall of Four Winds Plaza

**Installation:** No documents have been located that indicate the date of installation, repair, replacement and/or maintenance to this tank. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985.

**Four Winds Plaza:**

- Above Ground Diesel Storage Tank
  - Status: In Service
  - Size: Approximately 200 gallons
  - Location: West side of the Plaza adjacent to the Pump Room.

**Installation:** No documents have been located that indicate the date of installation. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985.

**Barker's/Riteway:**

- Above-Ground Diesel Storage Tank
  - Status: Abandoned
  - Size: Approx. 5 ft. in diameter, length, unknown
  - Location: On the west side of the Plaza near the approach to the Western Auto service area

and to the rear of the former  
Barker's/Riteway unit.

**Installation:** No documents have been located that indicate the date of installation, repair, replacement, and/or maintenance to the tank. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985. Tank is encased in an above-ground concrete access ramp.

**Cobb Theaters:**

- Partially Buried Diesel Storage Tank
  - Status: In Service
  - Size: Approximately 100 gallons
  - Location: On the south side of the Plaza

**Installation:** No documents have been located that indicate the date of installation repair, replacement and/or maintenance to the tank. The tank was installed prior to the purchase of the shopping center by Four Winds in September 1985.

**Quality Plus:**

- Above Ground Diesel Storage Tank
  - Status: Out Of Service - date unknown
  - Size: Approximately 25 gallons
  - Location: On the south side of the Plaza

**Installation:** No documents have been located that indicate the date of installation, repair, replacement and/or maintenance to the tank. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985.

**Pizza Hut:**

- Above Ground Propane Gas Cylinder
  - Status: In Service
  - Size: Approximately 200 pounds

Installation: No documents have been located that indicate the date of installation. Any records pertaining to repair, replacement and/or maintenance may be available from the owner of the tank and Four Winds will supplement this answer as to the tenant's information or existence of any records. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985.

**Bachman's Bakery:**

- Above Ground Propane Gas Cylinder

Status: In Service

Size: Large - will supplement with size when owner is identified.

Installation: No documents have been located that indicate the date of installation. Tank was installed prior to the purchase of the shopping center by Four Winds in September 1985. Any records pertaining to repair, replacement and/or maintenance may be available from the owner of the tank and Four Winds will supplement this response with the name and address of the tank's owner and any records if located by the tenant.

h. the facility cistern and catchment system.

**RESPONSE**

Please refer to the attached diagrams Sheets R-1, P-1 and P-2. This response will be supplemented with diagrams locating catchment system and the cisterns in the car wash and the addition on the south side of the Plaza.

12. For each septic tank, identified in question 11.a. above, state the date the tank was installed, the design plans for the system,

the firm that installed the system and all maintenance records. For any septic tank taken out of service, specify the date it was taken out of service and the reason for discontinuing its use. Also identify all discharges to the tank and the origin of these discharges.

**RESPONSE**

See response to 11.a. above. No septic tanks, past or present, are known or suspected to exist on site.

13. For each outfall or discharge identified in your response to question 11.b. above, state the nature of the discharge, any required permits for such discharges, the origin of the discharge and all associated piping.

**RESPONSE**

Esso Tutu:

For the 4" and 3" pipes discharging to the Four winds parking lot, the origin of the discharge is the waste oil system at the Esso Tutu Service Station. According to US EPA's Administrative Order of 3/22/90, and the results of the soil/gas surveys conducted by Belgodere and Associates and Target, this waste oil is believed to have been contaminated by substances found on the CERCLA List of Hazardous Substances. No permits were ever issued for these discharges. The outfalls and discharge locations of the waste oil system of Esso Tutu were never identified to the EPA in Esso's response to the EPA's Request for Information. This response will be supplemented since Esso's failure to do so is presently the subject of a motion for sanctions in the Tutu Water Wells Contamination Litigation.



As concerns the scupper like discharges at Esso Tutu, the origin of the discharge was the Esso Tutu Station. The nature of the discharge is assumed to be primarily rainwater runoff.

**Four Winds Cistern:**

The cistern discharges water collected in the Four Winds water catchment system only when the cistern reaches capacity. Since the Four Winds' wells have been contaminated, the source of the water that is discharged is rainwater collected from the roof.

The air conditioning discharge is condensation from the compressors, and is piped off the roof pursuant to the directions of DPNR to prevent contamination of the cistern at Four Winds.

The rainwater that is drained off certain sections of the roof is pursuant to the directions of DPNR until the Topcoat membrane is completely applied to these sections.

This response will be supplemented if responsive information is obtained as Four Winds continues with tenant interviews.

14. For each underground storage tank identified in your response to question 11.c. above, provide the following information:

a. the date the tank was installed:

**RESPONSE**

Four Winds has not located any documents that indicate the date that the Western Auto UST's were installed, however, it is believed that the UST's were installed at the time of original construction of the Plaza in the late 1970's. The installation was either by Western Auto's own finishing crews or at the direction of

Western Auto's Kansas City office which provided the instructions and approved the plans and specifications of the waste oil tank.

b. all design and installation records for the tank and associated piping, including the expected life of the tank and the corrosion protection for the tank and associated piping, seasonably high water levels and any lining system;

**RESPONSE**

Four Winds has not located any documents or information responsive to this request.

c. state whether or not the tank is currently in service; if not in service, state the date of closure and the reasons for discontinuing use of the tank, and any further plans for the tank;

**RESPONSE**

Western Auto Waste Oil UST:

The UST is no longer in service. The tank was apparently taken out of service in 1981 or 1982 when Western Auto discontinued oil changes at the facility. See responses to Questions No. 7. and 11.c. above.

Western Auto Diesel UST

Upon information and belief, the Western Auto's Diesel UST was abandoned in place in the early 1980's when an above ground diesel tank was put into service.

The Western Auto UST investigation conducted by Caribbean Hydro-Tech for Four Winds located and accessed the diesel UST and also sampled both the contents of the tank and the surrounding soil.

(See reports from Caribbean Hydro-Tech, Inc. to Clifford Crooke, DPNR)

Through deposition testimony, the following has been elicited:

Charles Frazer, Western Auto St. Thomas employee since April 1979.

Q: Okay. The underground tank that was used for diesel oil before that, where is that located?

A: Someplace around this area here.

Q: Okay. In the immediate vicinity of the yellow tank?

A: Yes, um-hum.

Q: Okay. When was that, when was that closed off? When was that closed and covered over?

A: About 11 or 12 years ago.

Q: Okay. Was that -- do you know whether it was removed from the ground or --

A: No, I have no idea.

Q: It was covered?

A: I have no idea. I think it was just covered over.

Q: Do you know who owned that tank; whose tank that was?

A: Well, we put diesel in it, so I assume it were Western Auto. I don't know about that.

[Deposition of Charles Frazer 11/9/92, Page 14, Lines 4-22.]

Four Winds has no additional information responsive to this request.

d. for any tank or piping that has been replaced, state the reason for replacing the tank or piping, the day of removal of the

tank or piping, the day of inspection and the firm that conducted such inspection, the workplan for the removal, the condition of the tank or piping upon removal, the condition of soil surrounding the replaced tank or piping, whether any soil was removed or taken, and any sampling results connected with the replacement of the tank or piping;

**RESPONSE**

Four Winds has found no information that suggests that Western Auto's two UST's or associated piping were ever replaced.

e. identify the type, characteristics and quantity of substances stored in the tank. Also provide all records related to the volume of materials shipped to the tank and removed from the tank.

**RESPONSE**

Western Auto's Waste Oil UST

Four Winds has found no information to suggest that anything but used motor oil was stored in the waste oil UST. In the response to Question No. 3. above, it was reported that Western Auto generated 50 gallons of waste oil per month.

The response to Question No. 7. above, indicates that the waste oil tank was emptied twice, and that service was performed by HMS Systems.

Four Winds has no additional information response to this request.

Western Auto's Diesel UST

Four Winds has been told that the diesel UST was used up to the early 1980's to store diesel oil to power Western Auto's emergency generator. In the attached reports from Caribbean Hydro-Tech to Clifford Crooke, lab reports indicate that the substance

in this tank in early December 1992, appeared to be diesel oil with the detected presence of 1,1,1-Trichloroethane at a level of 700 ppb. This data is presently being validated.

The only information that Four Winds has learned regarding the materials removed from the tank comes from the deposition of Charles Frazer:

Q: Do you recall when you switched from the underground tank to the above-ground tank for the diesel fuel, was there still diesel fuel in the underground tank?

A: No.

Q: There was not?

A: No.

Q: And why was that? Had you just used it all, or did you pump it out?

A: I don't know, that's what I'm saying, I don't know whether the oil -- diesel were in it or not, you know. I have no idea whether diesel were in it.

[Deposition of Charles Frazer, 11/9/92, Page 50, Lines 21-25, Page 51, Lines 3-9]

Q: Did anybody come and pump anything out of that tank?

A: They pump water. Smitty pumped water out of the tank.

Q: Where is Smitty from?

A: That's Quartermaster Diesel.

Q: Okay. After he pumped water out of the tank, was anything else to your knowledge put in the tank?

A: No. I think that's when it close up.

[Deposition of Charles Frazer, 11/9/92, Page 52, Lines 15-23]

Q: When he pumped this water out of the underground diesel tank--

A: Um-hum.

Q: where did he pump it to?

A: He had about nine or ten 55-gallon drums that he showed me he got filled with nothing but water.

Q: And then what did he do with them?

A: He took it away in a truck. He had his truck; he had them filled in the truck, and he took them away.

Q: Okay. Do you know whether the diesel tank was completely empty when they sealed it over?

A: I have no idea. I know he took all the water and he told me that's all he got out of it.

[Deposition of Charles Frazer, 11/9/92, Page 53, Lines 21-52; Page 54, Lines 3-11]

Four Winds has no further information responsive to this request.

f. provide a detailed accounting of all maintenance activities on each tank or piping. This should include a detailed description of each repair on the tank and piping, the reason for the repair and how the problem was discovered.

**RESPONSE**

Western Auto's Waste Oil UST

Four Winds has no information pertaining to any maintenance and repairs performed on the waste oil UST or associated piping.

**Western Auto's Diesel Fuel UST**

Four Winds has no information pertaining to any maintenance and repairs performed on the waste oil UST or associated piping.

g. identify each suspected leak or spill associated with the tank or piping. Provide the date of the leak, the quantity of material lost, and how was it determined, the corrective action undertaken, and the names and addresses of all persons with knowledge of the incident.

**RESPONSE**

**Western Auto's Waste Oil UST**

Four Winds has no information regarding leaks or spills from Western Auto's waste oil UST or associated piping. Four Winds has been told by Mr. Clifford Crooke of DPNR that he suspects that the hydrocarbon contamination in the soil adjacent to the waste oil UST is a result of sloppiness on the part of Western Auto employees as they poured waste oil into the UST.

Mr. Charles Frazer testified that there have not been any leaks from the tanks:

Q: Do you -- to your knowledge, were there ever any problems, did the company ever have any problems with an underground storage tank, leaks or overflow?

A: Sewage tank?

Q: Underground storage tanks. You've identified two; one for diesel oil --

A: And one for waste oil.

Q: and one for waste oil.

A: Yes.

Q: To the best of your knowledge, did you ever have any -- experience any problems with those tanks, overflows or leaks or any other problems?

A: Never, not since I was there.

[Deposition of Charles Frazer, 11/9/92, Page 30, Lines 4-20.]

#### Western Auto's Diesel Fuel UST

Four Winds has no information regarding leaks or spills from Western Auto's diesel UST or associated piping. Mr. Charles Frazer has testified that although the diesel UST was taken out of service because it was damaged it did not leak any diesel fuel.

Q: Okay. Why did they switch from using the underground diesel storage tank to power the generator to using this above ground?

A: Oh, okay. I heard the underground one was damaged. That's what I heard.

[Deposition of Charles Frazer, 11/9/92, Page 43, Lines 8-12]

Q: When you heard that this underground tank, diesel tank, was damaged, did you hear that it was leaking fuel?

A: No, I don't know that. I heard it had water, so that's why they used the side tank.

Q: Water where?



A: In the, in the tank, because the generator used to work and stop, work and stop.

[Deposition of Charles Frazer, 11/9/92, Page 43, Lines 23-25; Page 44, Lines 3-7.]

Q: Do you recall how it was determined that underground diesel tank was damaged?

A: Yes. I think the spouting got broken.

Q: The spout?

A: Yes.

Q: Broken in what way; do you know? Broken off?

A: I don't know whether it were off or what. That's what I've been told.

Q: Are you describing a spout that would come above ground from the tank?

A: Where you put the diesel fuel.

Q: Um-hum

MR. COLE: The fill pipe?

THE WITNESS: Yes, um-hum

BY MR. HILLSMAN:

Q: How was it damaged; do you know?

A: No, I don't know. I don't.

Q: Do you know whether or not when it was damaged that any diesel fuel leaked?

A: No, no diesel fuel, or else you would have seen it on the ground back there.

[Deposition of Charles Frazer, 11/9/92, Page 48, Line 12 through  
Page 49, Line 9]

h. provide a copy of all notifications given to the Department of Natural Resources regarding the existence of each tank.

**RESPONSE**

To date, DPNR has been notified of the existence of both Western Auto's UST's.. Notification was made on or about February 11, 1993 pursuant to Section 9002 of RCRA by the owner and operator of the tanks, Western Auto. A copy of the notification is attached as Exhibit X, Y or Z.

It is the position of Four Winds that under section 9001 of RCRA it is not the owner or operator of any underground storage tank on its property. For this reason, Four Winds has not filed a notification with DPNR of such tanks itself.

Section 9001 reads in pertinent part:

"For the purposes of this subchapter-...

(3) The term 'owner' means-

(A) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(B) in the case of any underground storage tank in use before November 8, 1984, any person who owned such tank immediately before the these products is discontinuation of its use.

(4) The term 'operator' means any person in control of, or having responsibility for, the daily operation of the underground storage tank."

42 U.S.C.A. §6991 (emphasis added).

15. For each floor drain, roof catchment drains, sewer or sink, identified in your response to question 11. e. and associated piping for each, state whether any hazardous products containing hazardous substances or regulated substances were disposed of in each.

**RESPONSE**

The products identified in response to Question 1 above and used by the car wash are diluted with water and/or are volatilized during routine use. The water collected from the car wash is reclaimed and, pursuant to the direction of USVI Public Works Department is discharged to the sanitary sewer.

At this time, Four Winds has no evidence that regulated substances, other than those found in such products as draino and household cleaners, have been disposed of through its sewer lines. Please refer to Four Winds' response to question number sixteen (16) for more on this subject.

16. For each location identified in your response to question 11.f. above, state the manner in which each hazardous or regulated substance is or was containerized and stored. Also provide a detailed description of any releases at each location, including the date of the incident, type and quantity of material released, person or agency notified, corrective actions taken and the names and addresses of any person with knowledge of the release.

**RESPONSE**

As noted in Four Winds' answer to question 11.f., the only locations where it is established that hazardous materials have been used are the Western Auto store and the Splash and Dash car wash. At the Western Auto site, mechanics used spray can solvents in their

work. The spray cans were factory sealed and stored on shelves in the work area. Because spray cans were used, disposal was not an issue. Any solvent that failed to volatilize during application was generally wiped up with a mechanic's rag and tossed in a commercial dumpster along with any spent spray cans. Four Winds has no evidence that a release of these solvents ever occurred prior to Western Auto's disposing of them in the Bovoni landfill.

The hazardous chemicals used at the Splash and Dash car wash are found within cleaning agents and are stored in factory sealed containers until use. Use of these materials involves the dilution and further mixture of the cleaning agents with water. After the water/cleaning agent mixture is applied to a vehicle, the used water is reclaimed for additional use and then eventually and pursuant to the directions of the Public Works Department, discharged to the sanitary sewer. As with the Western Auto store, Four Winds has no evidence that a release of chemicals ever occurred at Splash and Dash.

17. For each aboveground tank identified in your response to question 11.g. provide the following information:

a. Date of installation of tank.

**RESPONSE**

See response to question 11. g. above

b. Date of construction of the containment system, if any.

**RESPONSE**

During February of 1992, with the exception of Pueblo's two above-ground diesel tanks, concrete containment areas were constructed around the above-ground diesel tanks located at Four Winds Plaza.

c. Identify the type, characteristics and quantity of the products or substances stored at such unit.

**RESPONSE**

See response to question 11. g. above.

d. State whether any leaks or releases have occurred from such above ground tanks.

**RESPONSE**

Four Winds possess no evidence that any release ever occurred from any aboveground tank.

18. For the facility's cistern and catchment system identified in response to question 11. a., provide the following information.

a. Identify the type of product or substances in use or used to protect, cover or seal the catchment area since the construction of the shopping center.

**RESPONSE**

Prior to the purchase of the Plaza by Four Winds Plaza Partnership on September 12, 1985, the catchment area was coated with an asphalt type base covered with gravel. Four Winds knows of no lab analysis of the constituent components of this material.

This roof coating remained in place until September 18, 1989 when the roof was destroyed by Hurricane Hugo. Subsequent roof repairs used materials consisting of a rolled rubberoid material

manufactured by GAF as the base over which a liquid rubber coating manufactured by Topcoat of Walpole, Massachusetts was applied.

b. Identify the company or companies which applied and/or removed such product.

**RESPONSE**

SSS Roofing and Sheet metal was the firm hired to repair the roof. Roof repair was also performed by Four Winds Plaza management and personnel.

c. Explain how the materials removed or cleaned from the catchment area are or were handled and disposed of.

**RESPONSE**

The new roof material was placed over the old roof material. The material removed or cleaned from the roof catchment area was loose stone and/or gravel. This stone and/or gravel was then offered to St. Thomas masons who from Four Winds to use in the mixing of concrete.

d. Explain how the liquids or sludges are removed from the cistern, are or were handled and disposed of.

**RESPONSE**

At the suggestion of Mr. Leonard Reed of DPNR, when the cistern was emptied in 1991, the toilet valves in about ten stores were opened and the water was allowed to just constantly run, discharging to the sanitary sewer. In addition, during the day when management personnel were available to monitor, the valve on the

2,000 gallon pressure tank in the pump room was opened and this water also was discharged to the sanitary sewer.

When the cistern was emptied the remaining silt in the cistern was removed by Lew Henley's Sewage Disposal. Mr. Henley has testified that the silt from the Four Winds cistern was disposed in the government landfill at Bovoni.

e, Explain whether the water collected in the catchment area is or has been contaminated or unfit for human consumption.

**RESPONSE**

The water presently collected in the cistern from the roof catchment system is unrestricted and deemed acceptable for human consumption according to DPNR.

The water system at Four Winds Plaza was designed to use both well water from three wells located at the Plaza and from rain water collected from the roof catchment system. Water from both sources was designed to be stored in the cistern. This water would then be treated and distributed through-out the Plaza and is regulated by the government of the Virgin Island as a Public Water Supplier. In August 8, 1987, the wells at Four Winds were order closed due to the groundwater contamination. Except for a modifying order issued to Four Winds to allow the use of treated well water for non-human consumption at the car wash, Four Winds has been forced to rely on rain water and the purchasing of trucked water.

In the fall of 1990, relying solely on rain water collected from the roof, the cistern water took on an odor and a tea color. Subsequent water analysis revealed that the water exceed both

turbidity and bacteria criteria. This problem was traced to the GAF Rubberoid roofing material that was applied after Hugo destroyed the pre-existing roof.

In addition, since the Plaza was built, there have been occasions when the cistern water exceeded the standards for bacteria.

This response will be supplemented within the next thirty days with the dates when the safe drinking water standards have been exceeded.

f. If the answer to question 18. e. is yes, indicated how the water was removed and disposed of, the date of the incident, the date of the removal, provide copies of all chemical analysis of the water and cistern sludge, identify the persons involved in the removal and testing, the quality of the water removed, the date and disposal location and provide copy of all governmental permit obtained in relation to such activities.

**RESPONSE**

Information and documents responsive to this request, and not already provided in response to previous questions, will be provided within the next thirty days.

19. a. State the correct name of your company, which shall hereafter be referred to as the "Company".

**RESPONSE**

Four Winds Plaza Partnership is a Virgin Islands' limited partnership.



b. State the current legal name and status of the facility

**RESPONSE**

Four Winds owns in fee simple absolute the Four Winds Plaza Shopping Center and the underlying parcel of land located at Parcel 392 Estate Anna's Retreat (TuTu) No. 1 New Quarter, St. Thomas, U.S. Virgin Islands consisting of 10.08 acres, as more fully shown on P.W.D. Drawing No. A9-257-T77.

c. State the name(s) and address(es) of the President and Chairman of the Board, or partners of the Company.

**RESPONSE**

Partners:

Quincy Corporation (General Partner)

Fairfield Business Campus

333 Route 46 West

Fairfield, NJ 07004

North Jersey Development Corporation (Limited Partner)

P.O. Box 3692

St. Thomas, VI 00801

Fairfield Group (Limited Partner)

P.O. Box 3692

St. Thomas, VI 00801

Frank Bonanno (Limited Partner)

Fairfield Business Campus

333 Route 46 West

Fairfield, NJ 07004

d. Identify the state or incorporation and agent for service or process in the Virgin Islands of the owner and operator of the facility and any underground storage tanks thereon. If more than one, answer for each.

**RESPONSE**

Facility:

Four Winds Plaza Partnership  
Organized under the laws of the Virgin Islands  
Agent for service of process:  
CT Corporation  
24-25 Kongens Gade  
Charlotte Amalie  
St. Thomas, VI 00801

UST's

Western Auto Supply Company  
Organized under the laws of Delaware  
Agent for service of process:  
Richard E. Grunert  
24-25 Kongens Gade  
Charlotte Amalie  
St. Thomas, VI 00801

e. Identify the owner or operator of the facility  
underground tank.

**RESPONSE**

See response to question 19. d. above.

20. In identifying a Company that no longer exists, provide  
all the information called for in item 19, except for the agent for  
service of process. If the Company did business under more than  
one name, each name should be designated.

**RESPONSE**

Four Winds is unrelated to any other organization.

21. Does the facility have a permit or permits issued under  
the Resource Conservation and Recovery Act, 42 U.S.C. §§6901, et seq.

If the Company has an EPA identification number, state it in your answer.

**RESPONSE**

To Four Winds' knowledge, neither itself nor any of its tenants ever needed or possessed a permit issued under the Resource Conservation and Recovery Act.

22. Please respond to the following question by giving a detailed description, if the answer is yes to any of the questions: Did the facility or any of its past employees transport, arrange for transportation, disposal, or arrange for disposal of:

a. any hazardous waste?

**RESPONSE**

To the best of Four Winds' knowledge, neither itself nor any of its tenants ever transported, disposed or arranged for the transportation or disposal of any hazardous substance or waste. The only action taken concerning regulated substances involved Western Auto's removal of its waste oil during the years it stored such waste, and the commercial dumpster into which rags and spent aerosol cans were placed and then transported to Bovoni landfill by commercial carrier. The present waste hauler is D and C Heavy Equipment under contract by Western Auto. For a full description of this activity, please see Four Winds' response to questions number nine (9) and ten (10).

b. any hazardous substance?

**RESPONSE**

See response to question 22. a. above.

c. any regulated substance?

**RESPONSE**

See response to question 22. a. above.

23. State whether there exists any agreement or contract (other than an insurance policy), which may indemnify the Company, present owner of shares in the Company or past owners of shares in the Company, for any liability that may result from any release of a hazardous substance, regulated substance or hazardous waste from the facility. If so, please provide a copy of the agreement or contract. Identify any agreement or contract that you are unable to locate or obtain.

**RESPONSE**

Four Winds' has no knowledge of any agreement that might indemnify itself or any of its present or past partners for liability resulting from the release of any regulated substance.

24. State whether an insurance policy has ever been in effect which may indemnify the Company against any liability which it may have for any release or threatened release of a hazardous substance, regulated substance or hazardous waste that may have occurred at the facility. If so, please provide a copy of the policy. Identify any policy that you cannot locate or obtain by the name of the carrier, years in effect, nature and extent of coverage, and any other relevant information you have.

**RESPONSE**

Four Winds' insurance carrier maintains that no coverage exists and has filed a declaratory judgment action which is presently pending in the U.S. District Court, Division of St. Thomas and St. John. The EPA will be notified as soon as this issue is resolved.

**Additional Information**

Below is a list of the tenants of Four Winds Plaza since  
September 1985.

**Quality Foods - Unit 1A&B**

Retail food and Grocery

Status: Current Tenant

Quality Foods Corp.  
P.O. Box 1919  
St. Thomas, VI 00801

**VI Police Department - Unit 1C-1**

To Serve and To Protect

Status: Current Tenant

% Four winds Plaza  
392 Anna's Retreat  
St. Thomas, VI 00802

**Just-A-Thought - Unit 1C-11**

Video Game Arcade

Status: Former Tenant  
(through 9/89)

Just-A-Thought Amusements, Inc.  
P.O. Box 501  
St. Thomas, VI 00801

**Roy Schneider Campaign - Unit 1D**

Campaign Headquarters

Status: Former Tenant; Fall of 1986 only

Roy L. Schneider, MD..  
Estate Thomas Medical Foundation

St., Thomas, VI 00801

**R.C. Cobb Theaters of the V.I. - Unit 2-3**

Movie Theaters

Status: Current Tenant

R. C. Cobb, Inc.  
924 Montclair Road  
Birmingham, Alabama 35213

**Pizza Hut - Unit 4**

Restaurant

Status: Current Tenant  
Pizza Management, Inc., International  
P. O. Drawer 65100  
San Antonio, Texas 78265-5100

**People's Fashion/Value City - Unit 5**

Department Store

Status: Current Tenant

% Four Winds Plaza  
392 Estate Anna's Retreat  
St. Thomas, VI 00802

**Cupids - Unit 5A&B**

Retail Shoes

Status: Former Tenant  
(Until December, 1988)

Cupids Shoe Store  
P. O. Box 2763  
Charlotte Amalie  
St. Thomas, VI 00801

**Third World Electronics - Unit 7**

Retail Music and Electronics

Moved to Unit 1D in April of 1987

Status: Current Tenant

Third World Electronics  
P. O. Box 6104  
St. Thomas, VI 00801

**Four Winds Management Office - Unit 8** (through 6/89)

**Moscoso Drugs - Unit 9-14**  
Pharmacy

Status: Former Tenant  
(Until approximately 9/91)

Moscoso, Inc.  
G.P.O. Box 3687  
San Juan, PR 00936

**Western Auto - Unit 15**  
Retail Auto Supplies and Home Appliances

Status: Current Tenant

Western Auto Supply  
2107 Grand Avenue  
Kansas City, MO 64108

**Riteway - Unit 16**  
Retail Department Store

Status: Former Tenant, a/o approximately 7/89

Riteway  
P. O. Box 8830  
St. Thomas, VI 00801

**VI Furniture - Unit 17&18**  
Retail Furniture

Status: Current Tenant

V.I. Furniture  
P. O. Box 8830  
St. Thomas, VI 00801

**Kinney Shoes - Unit 19**

Retail Shoes

Status: Current Tenant

Kinney Shoes  
P. O. Box 2663  
Harrisburg, PA 17105

**Marianne's - Unit 20**

Retail Women's Clothing

Status: Current Tenant

Petrie Store Corp.  
70 Enterprise Ave.  
Secaucus, NJ 07094

**Pueblo - Unit 21**

Supermarket

Status: Current Tenant

Pueblo International, Inc.  
G.P.O. Box 3288  
San Juan, PR 00936

**Gourmet Gallery - Unit 22**

Retail Specialty Foods

Status: Former Tenant, a/o 9/89

Gourmet Gallery, Inc.  
P. O. Box 4987  
St. Thomas, VI 00801

**H.B. Inc. (Flower Shop) - Unit 22-A**

Retail Florist



Status: Current Tenant

Contant Flowers  
% Four winds Plaza  
St. Thomas, VI 00802

**Bachman's Bakery - Unit 23**

Fresh Baked Goods  
(take-out only)

Status: Current Tenant

H. B. Inc.,  
d/b/a Bachman's Bakery  
P. O. Box 3304  
St. Thomas, VI 00801

**Glenronics - Unit 24** (through 6/89)

(De-De's Sight and Sound)  
Electronics and Video Rentals

Status: Former Tenant, a/o 6/89

P. O. Box 6-L  
Sunny Isle  
St. Croix, VI 00820

**McDonalds - Unit 23R & 24R**

Warehouse Only

Status: Former Tenant (a/o 7/90)

McDonald's  
P. O. Box 3449  
Christiansted  
St. Croix, VI 00822

C

**Gardner/McLaughlin - Second Floor**

(Sold To J. C. Bonanno in 1986, and  
then to Frank Bonanno in 1990)

**Tom Gasset Jeep Eagle - Parking Lot**

Auto Dealer

Status: Former Tenant  
(2/89 - 3/89)

**Showtime Video - Unit 24**

Video Rentals

Status: Current Tenant (a/o 12/89)

Showtime Video  
% four Winds Plaza  
Anna's Retreat  
St. Thomas, VI 00802

**Nafez Furniture - Unit 16B**

Retail Furniture

Status: Current Tenant (a/o 9/89)

Furniture Warehouse and Appliance, Inc.  
% Four Winds Plaza  
Anna's Retreat  
St. Thomas, VI 00802

**Arwak Supply/Advantage Travel - Unit 22**

Travel Agent

Status: Current Tenant

P.O. Box 3986  
St. Thomas, VI 00801

**Pastabilities - Unit 1-C**

Restaurant

Status: Former Tenant (12/90 - 11/91)

**Sisserou - Unit 1-C**  
Restaurant

Status: Current Tenant (a/o 12/91)

Sisserou  
% Four Winds Plaza  
392 Anna's Retreat  
St. Thomas, VI 00802

**Joe's Discount - Unit 9-14**  
Pharmacy

Status: Current Tenant (a/o 9/91)

Joe's Discount  
% Four Winds Plaza  
392 Anna's Retreat  
St. Thomas, VI 00802

**Electronics Unlimited - Unit 16-A**  
Retail Electronics

Status: Current Tenant (a/o 9/91)

Electronics Unlimited  
% Four Winds Plaza  
392 Anna's Retreat  
St. Thomas, VI 00802

**Splash & Dash Car Wash - Unit 25**  
Drive through Car Wash

Status: Current Tenant (a/o 7/91)

Splash and Dash Car Wash  
% Four winds Plaza  
392 Anna's Retreat  
St. Thomas, VI 00802

**Lock It Please Inc. - New Courtyard Unit**

**Locksmith and retail lock hardware**

**Status: Current Tenant**

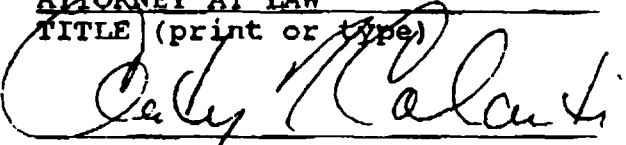
CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey :  
                              : SS:  
County of Essex      :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that the submitted information, to the best of my knowledge and belief, is true, accurate and complete and, to the best of my knowledge and belief, all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

ANTHONY T. COLASANTI  
NAME (print or type)

ATTORNEY AT LAW  
TITLE (print or type)

  
SIGNATURE

Sworn to before me this 1st  
day of March, 1993 -

  
Notary Public

STATE OF NEW JERSEY  
My Commission Expires Aug. 30, 1995