

SDMS Document



115558



August 24, 1998

Ms. Caroline Kwan
U.S. Environmental Protection Agency
Region II
Emergency Remedial Response Division
290 Broadway, 20th Floor
New York, NY 10007-1866

**RE: Island Chemical Site
St. Croix, U.S. Virgin Islands
Clarifications to Supplemental Remedial Investigation dated August 12, 1998**

Dear Ms. Kwan:

On August 20, 1998, a conference call was held between the U.S. Environmental Protection Agency (EPA), CDM Federal Programs Corporation (CDM Federal), Berlex Laboratories, Inc. (Berlex), and McLaren/Hart, Inc. (McLaren/Hart) to discuss comments on the Supplemental Remedial Investigation (Phase IV RI) letter submitted on August 12, 1998. The purpose of this letter is to summarize and address the concerns raised during the conference call, and to serve as an amendment to the August 12th correspondence.

Screening Criterion

The screening criterion for the delineation of horizontal and vertical chloroform impacts to groundwater will be 80 $\mu\text{g/l}$. As an example, if chloroform is detected at a concentration of 85 $\mu\text{g/l}$ at location GWPP-29A, and at a depth of 70 feet below ground surface (bgs), then another vertical screening point will be positioned laterally from this point, to the extent feasible based on accessibility. Groundwater samples will be collected at the same interval as the exceedance (70 feet bgs, in this case), at the interval above the exceedance (i.e., 60 feet bgs), and at two intervals below the exceedance (i.e., 80 and 90 feet bgs). This is one potential scenario that could be encountered during the investigation. Additional screening locations and appropriate depth intervals for collection of samples will be determined, in consultation with EPA and CDM Federal, after evaluating the analytical results. It is McLaren/Hart's understanding that if chloroform is detected at a concentration below 80 $\mu\text{g/l}$ at any interval (e.g., 78 $\mu\text{g/l}$), additional delineation will not be required.

Packer Testing

McLaren/Hart understands that there may be uncertainties involved with interpreting the results from groundwater samples collected above and below the packer in production well P-1. If it is believed that there is a hydraulic connection between the overburden and bedrock zones, then this connection will be substantiated with additional hydrogeologic data.

G:\STAFF\NICH\1\island\phase4\revision.wpd

302355P

25 Independence Boulevard, Warren, New Jersey 07059 (908) 647-8111 FAX (908) 647-8162



Ms. Caroline Kwan
August 24, 1998
Page 2

Automatic Groundwater Elevation Measurements

Telog® automatic water level monitoring devices will be installed in the following wells:

- existing deep monitoring wells MW-7, MW-8, and MW-9,
- production wells P-1 and P-2, and
- newly-installed deep monitoring wells MW-12 and MW-14.

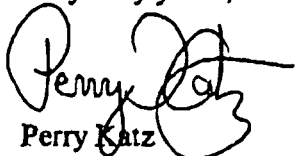
Multiple activities at the well locations will be coordinated, to the extent practicable, to allow for a maximum time interval for collection of water levels (i.e., will attempt to complete packer testing at P-1 shortly after mobilization to the site so that the Telog® can be installed immediately afterwards).

Investigation Derived Waste (IDW)

As stated in the August 12th correspondence, the existing drums of IDW at the site (Phase III work) has been tested, as appropriate, for determination of an appropriate means of disposal. The non-hazardous drums of soil, mud, and water will be emptied and spread over the area of the site from which they were generated. The drums of water that were characterized as RCRA-hazardous (based on the analytical results) will be separated into two categories, decontamination fluids and AST development/purge water, and resampled (one composite sample from each category). IDW generated during the Phase IV RI work will be segregated by matrix (i.e., mud, soil, water) and staged for sampling at the end of the investigation. A composite sample will be collected from each matrix and analyzed onsite for the Target Site Compounds (chloroform, toluene, ethylbenzene, xylenes, acetone, and methylene chloride). The total concentration of each compound will be divided by 5 and compared to the Toxicity Characteristic Leaching Procedure (TCLP) regulatory level for the specific compound. If the concentration of each compound is below the TCLP level, the IDW will be considered non-hazardous and treated in the same manner as the Phase III material. If the concentration of any of the compounds is above the TCLP level, the material will be segregated for further characterization.

Based on a review of this letter, McLaren/Hart would like to request written notification of the approval the Phase IV RI activities scoped for the Island Chemical Site. If you have any additional questions or concerns, please feel free to contact either of us at (908) 647-8111.

Very truly yours,



Perry Katz
Principal Environmental Scientist



Norma Eichlin
Senior Engineer



ENVIRONMENTAL ENGINEERING CORPORATION

302355Q

