Harding Lawson Associates

April 12, 1996

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Ms. Sherrel Taylor-Domville
United States Environmental Protection Agency
Section II
Emergency and Remedial Response Division
290 Broadway
New York, New York 10007-1866

Proposed Site Activities
Phase II Remedial Investigation Work Plan
Island Chemical Company, St. Croix, U.S. Virgin Islands

Dear Ms. Taylor-Domville:

Harding Lawson Associates (HLA) is submitting this letter, on behalf of Island Chemical Company (ICC), to summarize our understanding of the items agreed to during our March 15, 1996 meeting. It is HLA's understanding that the EPA will issue an interim response to HLA's February 23, 1996 *Response to Comments* letter associated with the Draft Phase II Remedial Investigation Work Plan (RIWP) for the subject site to permit the installation of continuous water level recorders and the review of the data generated thereby before EPA comments on the rest of the RIWP. Since ICC or HLA has not yet received this letter, we would propose that EPA's interim response likewise permit some additional work to further facilitate the progress of the project. HLA recommends that the following preliminary site activities be initiated immediately:

- HLA recommends that continuous water level data be collected to document the prevailing direction of groundwater flow under static conditions. HLA proposes to install two additional continuous water level recorders in the two remaining onsite wells. Installation of these recorders, in addition to the two recorders currently functioning onsite, will provide continuous data across the majority of the site. These recorders will provide data regarding the percentage of time that groundwater flows in any given direction.

Once the data generated from the above activities are evaluated, additional interim site activities are recommended to be implemented, including:

- A soil sampling program will be conducted to investigate the extent of impact in the AST. The surficial extent of impact in Area B will be evaluated by collecting and analyzing 12 surface soil samples. Surface soil samples will be collected using decontaminated shovels and stainless steel trowels. Samples will be collected from the 18- to 24-inch interval below ground surface.
- The vertical extent of impact in Area B will be evaluated by collecting and analyzing selected soil samples from four to six soil borings. Continuos split spoon samples will be collected from the surface to the water table at each location. Samples will be placed directly into laboratory-prepared sample containers. Additional sample volume will be collected into resealable plastic bags and screened in the field using a photoionization detector (PID) according to procedures described in the FSP. Procedures for sample handling, management, and shipping are described in the FSP and QAPP. Selected samples will be analyzed and additional borings may be installed based on the PID results. Soil samples will be analyzed for VOCs.

With EPA approval, planned monitoring well MW-2 was not completed during the January 1995 field program. As discussed with EPA, an area of low permeability was encountered above the water table in SBC1. The possibility that well installation might provide a conduit for contaminants to reach groundwater was a concern at the time. However, analytical results of soil samples collected from SBC1 indicated that soils above the water table in this area were not contaminated. Therefore, MW-2 will be installed in Area C, as specified in the Phase I Work Plan. This well will be used to evaluate groundwater at the center of the site and to provide additional water level control data.

The well will be installed and developed as described in the FSP. Development water will be placed in 55-gallon drums and staged onsite pending disposal. Groundwater samples collected from the proposed monitoring well (MW-2) will be analyzed for TCL VOCs, TCL SVOCs, TCL Pesticides, TCL PCBs, and TAL Inorganics (total and dissolved).

Once the data developed through the foregoing activities has been analyzed and submitted to EPA, HLA's RIWP will be re-evaluated in context. HLA requests approval to perform the preliminary site activities delineated above. If a response is not received from EPA by April 22, 1996, HLA assumes that EPA authorizes implementation of these activities.

Please call either of the undersigned if you have any questions.

Yours very truly,

HARDING LAWSON ASSOCIATES

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This document was prepared for the sole use of the ICC and the regulatory agencies involved with the project, the only intended beneficiaries of our work. No other parties should rely on the information contained herein without the prior written consent of HLA.