

**United States Environmental Protection Agency
Region II
POLLUTION REPORT**

Date: Monday, September 15, 2008

From: Jeff M. Bechtel

To: Francine Lang, VI DOH

Subject: VIDOH Malathion Site

VI DOH St Thomas

Old Municipal Facility, Charlotte Amalie, St Thomas, VI

Latitude: 18.3451000

Longitude: -64.9260300

POLREP No.:	1	Site #:	LR
Reporting Period:	9/4 - 15/ 2008	D.O. #:	0010
Start Date:	9/4/2008	Response Authority:	CERCLA
Mob Date:	9/4/2008	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	EP-S2-05-01
RCRIS ID #:			

Site Description

The US Environmental Protection Agency's (EPA) Response and Prevention Branch conducted a CERCLA removal action to remove a quantity of pesticides and unknown chemicals from a facility belonging to the US Virgin Islands Department of Health (DOH), Division of Environmental Health (DEH) on St. Thomas, USVI.

This removal action was prompted by an inspection by EPA on August 20, 2008 at the Old Municipal Facility in Charlotte Amalie. EPA's VI Coordinator responded to the site on August 21, 2008 along with EPA's Response and Prevention Branch (RPB) personnel and met with the Director of DEH, and toured the outside of the chemical storage facility. Upon opening the door to the facility, EPA detected a strong odor of pesticides. EPA was informed that the storage building contained chemicals from as long as ten years ago. It was also indicated that some of the containers were corroded and missing labels. This portion of the building is considered abandoned by the DOH.

There are a number of sensitive populations surrounding the site in close proximity. These include a pre-school, Head Start, and a day care service housed in the adjoining Department of Human Services facility as well as the Lionel Robert Stadium, the Winston Raymo Recreation Center, and the DOH employees.

Current Activities

EPA issued a CERCLA Notice to the DOH as the Responsible Party on August 21, 2008 and indicated that the DOH should procure the services of a certified cleanup contractor and proceed with a materials removal action. EPA also made a commitment to assist DOH in realizing the materials removal action.

In keeping with the promise to assist DOH, EPA's RPB personnel toured the site again on September 4, 2008 and observed that conditions had not changed regarding the storage of chemicals and the release of materials within the building.

EPA observed the presence of two 55 gallon drums of 100% minerals oils, one 30 gallon drum of 5% pyrethrin based insecticide, one 5 gallon pail of deodorizer known as Sentrous, one empty 5 gallon pail, 3 cans of spray paint and two 50 pound cans of military grade bleaching agent (calcium hypochlorite).

EPA observed stained wooden pallets and carpeting. A corroded hole in the top of the one bleaching agent container offered a view of the bagged powder inside. Chlorine gas readings taken at the opening with a Draeger CMS unit indicated 1.14 ppm.

In view of the inability of the VI Fire Service's Hazmat Team to stabilize the site in a timely manner and the extent of time that it would take the DOH to procure a contractor for that purpose, coupled with department's financial constraints and the susceptibility of the materials to hurricane damage, EPA decided

to perform the cleanup.

On September 4, 2008, EPA verbally authorized funding for the materials removal action at the DOH's St. Thomas facility.

EPA held a conference call with the Commissioner of the DOH and informed her of EPA's intention to conduct a removal action at the facility. A letter commemorating EPA's intent to perform the cleanup was sent to the Commissioner on September 10, 2008.

An access agreement was signed by the Commissioner on September 5, 2008.

EPA commenced site activities on September 8, 2008.

The two drums of 100% minerals oils and the one drum of insecticide were cleaned off and deemed suitable for shipment, the two containers of calcium hypochlorite were overpacked into one drum, the cans of spray paint were expended on site and the one pail of Sentrous deodorizer was overpacked into one drum. The contents of one truck mount spray apparatus were transferred into one drum. The empty containers were disposed of on the island.

The contaminated carpeting, debris and spent PPE were placed into two super sacks.

The interior walls and floor were washed down to remove residual pesticides.

All of the waste stream were sampled and the samples were shipped to Pace Analytical in Puerto Rico on September 15, 2008.

The waste streams were secured on site pending disposal.

The site was demobilized on September 15, 2008.

Planned Removal Actions

Containerize all waste streams into DOT approved containers for off island disposal.

Collect samples of waste streams and procure lab for disposal analysis. Ship samples to lab.

Decon interior building floors & walls.

Secure waste streams on site and coordinate disposal.

Next Steps

Review of the sample analysis.

Solicitation of bids for off site disposal.

Shipment of the materials off site for disposal.

Key Issues

In 1998 EPA conducted a cleanup of pesticides from the exact same facility for the DOH.

Failure to develop and adhere to a pesticide storage and handling plan over the interim ten years led to the recurrence of this problem.

In addition, the lack of an effective respiratory protection program limits the ability of DOH personnel to mitigate pesticide spills.

response.epa.gov/VIDOHSTT