David R. DiGiacomo
P.O. Box 37
St. John, VI 00831
Email: davedigiacomo@mac.com

September 22, 2020

Mr. Gary Engle
CBI Acquisitions, LLC
dba Caneel Bay Resort
North Shore Road
Cruz Bay, Virgin Islands 00831

Mr. Gary Engle
EHI Acquisitions, LLC
Authorized Representative of CBI Acquisitions, LLC
dba Caneel Bay Resort
North Shore Road
Cruz Bay, Virgin Islands 00831

Mr. Stan Austin
Regional Director
Southeast Region
National Park Service
US Department of Interior
Atlanta Federal Center
1924 Building
100 Alabama Street #510
Atlanta, GA 30303

Ms. Joyce A. Stanley
Regional Environment Officer
Office of Environmental Policy and Compliance
US Department of Interior
Atlanta Region
Suite 1144
75 Ted Turner Drive, SW
Atlanta, GA 30303

Mr. Pete Lopez
Regional Director
Environmental Protection Agency
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Director Carmen Guerrero
Caribbean Environmental Protection Division
Environmental Protection Agency
Region 2, Regional Office
New York, NY 10007-1866

Superintendent Nigel Fields
Virgin Islands National Park
1300 Cruz Bay Creek
St. John, Virgin Islands 00830

Governor Albert Bryan, Jr.
United States Virgin Islands
5047 (21-22) Kongens Gade
St. Thomas, Virgin Islands 00802-6487

RE: Environmental Contamination of the Property Known as "Caneel"

Notice of Intent to File Suit Pursuant to the Resource Conservation and Recovery Act 42 U.S.C. § 6972(b) (1) & (2) for hazardous waste violations at the site or property known as "Caneel" on the Island of St. John, United States Virgin Islands
And
Notice Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 42 U.S.C. §§ 9601-9657
And
Notice Pursuant to the Clean Water Act 33 U.S.C. §§ 1251-1376

Dear Mr. Engle, Representatives of the Department of the Interior and Environmental Protection Agency and Governor Bryan:

I write to you on my own behalf as a citizen of the United States of America and as a resident property owner living on the island of St. John, United States Virgin Islands, to provide you with this Notice of Intent to File Suit pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6972(b) (1) & (2), Notice Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 42 U.S.C. §§ 9601-9657 and Notice Pursuant to the Clean Water Act, 33 U.S.C. §§ 1251-1376.

This Notice is given with respect to the property known as "Caneel" and concerns actual and potential RCRA, CERCLA and Clean Water Act violations by Federal agencies with ownership and jurisdiction over the Caneel property and actual and potential violations by CBI Acquisitions, LLC (referred to as CBIA in this notice) and EHI Acquisitions, LLC (referred to as EHIA in this notice) which are the companies occupying the Caneel property and operating the Caneel Resort under the alleged authority of a Retained Use Agreement.

This notice also describes actual and potential contamination of the land and water at or on the property commonly known as "Caneel" located on the island of St. John in the United States

Virgin Islands. This notice also concerns potential RCRA, CERCLA and Clean Water Act violations by CBIA and EHIA with respect to demolition, remediation, and construction activities occurring after the hurricane storms known as Irma and Maria which impacted the Caneel property in 2017.

The primary concern is that of assessing the nature and extent of the contamination of the Caneel property by hazardous and other wastes as described in the applicable statutes and regulations and then the elimination of the offending materials from the Caneel site in ways that meet all applicable Federal statutes, regulations and guidelines. Such elimination ordinarily occurs after a full assessment of the nature and extent of the contamination and the adoption of a remediation plan that meets all applicable Federal statutes, regulations and guidelines.

If we are unable to resolve this matter cooperatively, a lawsuit may proceed under 42 U.S.C. § 6972(a) (1) (A) (violation of RCRA regulations and prohibitions) and/or 42 U.S.C. § 6972(a) (1) (B) (abatement of conditions that may present an imminent and substantial endangerment to health or the environment). Suit may also be brought under the Clean Water Act, 42 U.S.C. § 1365 and under CERCLA, 42 U.S.C. § 9607.

RCRA, 42 U.S.C. § 6972(b) (1) empowers plaintiffs to bring suit "immediately" in the case of an alleged violation of RCRA's hazardous waste regulations. In other words, RCRA does not necessarily mandate a 90-day waiting period under the circumstances existing in relation to the Caneel site. In the interests of promoting a cooperative solution, however, it is my intention to wait for a reasonable time after you have received this Notice before filing a lawsuit. My hope is that you will contact me and indicate a willingness to agree to suspend current operations related to the Caneel site until you have performed a lawful determination under 40 C.F.R. § 262.11 that includes a full characterization of the sources of all waste and the remediation of all waste. CERCLA and the Clean Water Act also empower citizens to bring suit.

Responsible Parties

The property on which the waste has been deposited is located within the boundaries of the Virgin Islands National Park. The property is known as Caneel and is described in the attached Indenture or deed dated September 30, 1983 executed by Mr. Laurence Rockefeller on behalf of Jackson Hole Preserve, Incorporated. See Schedule A, recorded pages 366-371 of the September 30, 1983 Indenture or deed for a full legal description of the properties involved or at issue. It is not known at this time if the area near the catchment basin is included in the attached legal description but it is an area under the control of CBIA and EHI and subject to this notice.

The property consists of a number of parcels which combined total approximately 148.618 acres according to the September 1983 indenture or deed. The legal description of the properties involved also appears in a 1986 assignment agreement related to the Caneel property. A copy of the assignment is included and incorporated by reference. The September 30, 1983 Indenture or deed unequivocally establishes that the Caneel property is owned by the people of the United States of America. The people of the United States of America accepted delivery of the deed and the property. The deed to the property was recorded with the Government of the Virgin Islands.

Subsequent to the deeding of the properties to the people of the United States one or more entities had operations or activities on the Caneel property prior to CBIA and EHIA taking control of the Caneel property in 2004. At this time the names of all the entities which carried on operations at the Caneel site are not known but the entities may be discovered and this notice will be supplemented if deemed relevant.

In this notice, I will refer to the people responsible for the violations alleged in this Notice collectively as "you."

The responsible parties are:

1. Gary Engle in his capacity as an officer, director or manager of the entities known as CBIA and EHIA. Mr. Engle has not only directly controlled and approved of the activities of CBIA and EHIA at Caneel but has personal and first-hand knowledge of the activities of CBIA and EHIA on the Caneel site;

2. CBIA and EHIA, limited liability corporations or companies organized under the laws of the Virgin Islands in 2003 and the alleged holder of certain rights under a Retained Use Estate (RUE) agreement existing by reason of the Indenture or deed signed by Mr. Rockefeller in September of 1983. By giving this notice I am not agreeing that CBIA and EHIA rightfully took possession of the Caneel property according to the terms of assignment as such are prescribed in the September 1983 Indenture or deed or the subsequent 1986 assignment of the RUE.

3. The Department of Interior which has jurisdiction over the Caneel property subsequent to it being gifted to the people of the United States;

4. The National Park Service, an agency of the United States Government and under the jurisdiction of the Department of Interior which manages the Virgin Island National Park;

Under RCRA, CERCLA and the Clean Water Act you are each potentially jointly and severally liable for injunctive relief and costs of litigation, including reasonable attorney and expert witness fees. Case law exists that could arguably make Mr. Engle and officers and directors of CBIA and EHI personally responsible for the any environmental contamination of the Caneel site.

In addition, responsible parties are also each potentially liable under RCRA for civil penalties (to be paid to the U.S. Treasury) of up to $37,500 per day, per violation. The use of certain storage tanks can increase the possible penalties.

The regulations and requirements violated and the activities alleged to be violations

Upon information and belief, by depositing hazardous waste and by disturbing, digging up, and managing (or not managing) contaminated soils at the Caneel site, you are generating solid waste that includes waste that exhibits the characteristic of toxicity and is therefore "hazardous waste" under and as defined by the applicable laws. *See* 40 C.F.R. § 260.10 for one such definition. While the Department of Interior did not directly generate solid or hazardous waste it failed to

insure that hazardous waste would be properly handled at the Caneel site and once the Department of Interior learned of the existence of hazardous waste it took no actions to further assess and remediate the waste. As owner of the Caneel property the Department of the Interior has the responsibility to protect the lands and waters of the property owned by the people of the United States.

Upon information and belief, you are each a generator of hazardous waste yet you have failed to make a lawful determination as to whether the waste is hazardous, as required by 40 C.F.R. § 262.11. Specifically, you have failed to lawfully and fully analyze representative samples of materials that already contain waste and you have not analyzed representative samples that will be generated as waste and managed during any demolition, remediation and construction process.

By way of example and not limitation, an appropriate analysis would include full characterization of sources of waste using recognized scientific and statutory processes. Upon information and belief, your failure to conduct these necessary analyses resulted in your violation of numerous other RCRA requirements and requirements of CERCLA and the Clean Water Act.

Your violations may include, without limitation, one or more of the following provisions of RCRA and its implementing regulations:

1. 40 C.F.R. § 262.11: violation of the generator' duty to conduct a lawful determination of whether generated waste is hazardous;
2. 42 U.S.C. § 6925(a): violation of RCRA's fundamental prohibition of storage and disposal of hazardous waste without a permit;
3. If the site is determined to be a remediation waste management site then additional violations may exist. See 40 C.F.R. §§ 270.85, 270.100, and 270.105; failure to obtain a Remedial Action Plan (RAP) permit; failure to apply for a RAP; failure to sign a RAP application, and failure to make the required certification; 40 C.F.R. § 264.1(j)(2): violation of the duty held by the owner and operator to obtain an appropriate detailed chemical and physical analysis of representative samples of the hazardous wastes to be managed at the site; 40 C.F.R. § 262.12(a): violation of the generator's duty to obtain an EPA identification number; 40 C.F.R. § 264.1(j) (1): violation of the duty held by the owner and operator to obtain an EPA identification number; 40 C.F.R. § 262.34: violation of the generator's duty to comply with accumulation limits; 40 C.F.R. § 264.1(j) (10): violation of the duty held by the owner and operator to develop and maintain procedures to prevent accidents and a contingency and emergency plan to control accidents; and 40 C.F.R. § 264.1(j) (13): violation of the duty held by the owner and operator to maintain records documenting compliance with certain provisions of the Act.
10. Upon information and belief, the discovery process may reveal additional violations of other RCRA, CERCLA and Clean Water Act provisions and regulations. This list is not exhaustive of all statutes and regulations which may apply or which may have been violated.

To the extent the laws of the Territory of the Virgin Islands are applicable (I assert that Federal laws apply) to a property owned by the United States Government the improper storage, transportation and disposal of hazardous wastes violates the Virgin Islands code at 19 V.I.C. §§ 1558 & 1563. Other sections of the Virgin Islands code may also be relevant.

Furthermore, upon information and belief, your management of and remediation or non-remediation of solid and hazardous waste on the Caneel property may present an imminent and substantial endangerment to human health and the environment including damage to coral, fish, turtles, and rare and endangered plant species on or adjacent to the property. Turtles have been known to nest on one or more of the 7 beaches adjacent to Caneel.

Dates of the Violations

Upon information and belief, the violations began in 2004, when CBIA and EHIA commenced activities on the Caneel property. The activities and violations, if any, have continued, on a daily basis to the present time. Three environmental reports dated January 2017, March of 2014, and September 2012, included with this notice, give some indication as to the dates of any activities resulting in contamination of soil or water and more specifically describe the types of contamination and the locations.

Additional Information

I. Asbestos, DDT and Fuel Oil

The undersigned has inquired in the St. John community regarding certain activities of CBIA and EHIA related to hazardous waste and it has been stated that certain buildings on the Caneel site were remodeled at a point in time which is unknown at this writing. It has been rumored also that asbestos was incorporated into some of the structures and when remodeling occurred asbestos was disposed of on the Caneel site and not in accordance with applicable laws. This writer has no direct knowledge of such occurring but since it has been alleged that CBIA and EHIA have not allowed the Department of the Interior to further investigate the contamination that may be on the site it is not known whether or not the asbestos reporting is accurate. Regardless of whether or not CBIA and EHIA have allowed access to the site, a full assessment of the existence or non-existence of asbestos on the site should occur after obtaining information from CBIA and EHIA and former employees and/or contractors who were engaged in remodeling or construction activities and who may know where the asbestos was disposed of, if such occurred. If asbestos was on the site as has been rumored then CBIA and EHIA should have a record of the asbestos found on the site and should have a record of the means of disposal and be able to document that the disposal was in accord with all applicable laws and regulations. The 2014 Environmental Site Assessment Report documented asbestos pipes on the site. It was recommended that additional investigations should be conducted to identify the locations of the asbestos pipes on the property. It was further recommended that asbestos pipes should be removed and properly disposed of. In the meantime it was recommended that care should be taken not to disturb the existing pipes. No such remediation has occurred.

It has been reported by a former employee of Caneel that drums of DDT, which is a an identified and/or scheduled hazardous waste, were stored in the open air *near the*

catchment basin in an approximate location shown right hand side of the aerial photographs attached to the 2017 Removal Site Evaluation Report and more specifically identified on the attached aerial photo (Marked Exhibit 1) with the area of storage circled in red. The location of the DDT storage was not investigated by any of the engineers who provided environmental assessment reports. The DDT likely leaked onto the ground at some point in time and because of the topography the DDT would have been able to travel downstream into Hawksnest beach and adjacent waters. Assessments should be undertaken to determine if DDT presently exists at the site and if it does whether it infiltrated the soils and contaminated the Hawksnest beach area and gut that leads to the beach. The storage of the DDT and its disposal may have occurred prior to CBIA and EHIA taking possession of the Caneel property. If CBIA and EHIA were aware of the storage of DDT and disposed of it then they should have records of the disposal available for inspection.

Oil and/or fuel oil was used at the Caneel site and deposited on the soils. The environmental reports document some of such contamination. The dates and location of all such contamination are not known at this time but further inquiry and assessment should occur to determine the full extent of the fuel and/or fuel oil contamination. Further investigation should occur to determine the extent of the contamination of the ground and surface waters. Such was recommended in the 2017 environmental assessment report.

II. Dump site

The 2014 Environmental Site Assessment Report found the existence of a land fill near Honeymoon beach which had been used for over 50 years to dispose of all types of wastes. Staff reported that the deposited material is up to 15 feet thick in places. The 2014 report has complete information regarding the location of the landfill.

The report found: **"The screening criteria exceedances in the surface soil at this site indicate that there is a concern for leachability of alpha chlordane, dieldrin, several SVOCs, PCB and selenium to groundwater.** " Further assessment was recommended to determine the horizontal and vertical extents of the constituents in the soil at the site. If the site was used for waste disposal such site does not appear to have been approved by any Territorial or Federal governing agency for such purpose. The site should be investigated as previously recommended to determine the extent of waste and hazardous waste disposal. If the existence of hazardous waste is proven to be the case then the site should be remediated in accord with all applicable laws and regulations.

III. Failure to Appropriately Assess the Site and Conduct a Hazardous Waste Determination Violates RCRA

CBIA, EHIA and the National Park Service received copies of the three environmental assessments and reports performed by engineering firms. Relevant

portions of the reports related to those assessments are included and incorporated by reference.

The 2012 Level 1 environmental report prepared by Barksdale and Associates and the site assessment concluded the following:

There are a number of recognized environmental conditions (RECs) identified in connection with the property. These RECs are associated with: the maintenance and engineering area; the landscaping and grounds maintenance area; the wastewater treatment plant; the emergency generator building; the emergency generator fuel tanks; the marina; the former fuel storage tanks for the marina; and the debris landfill.

The 2014 Level II environmental site assessment report prepared by Barksdale and Associates concluded the following:

The results of this assessment indicate that a release of hazardous substances or petroleum products has occurred at all seven sites investigated for this Level II ESA. Additional Level II assessment activities are recommended.

The 2017 Removal Site Evaluation Report prepared by 3E Consultants concluded the following:

As identified through review of the above referenced documents and specifically the Level I Environmental Site Assessment (ESA) and a Level II ESA, the Caneel Bay property has seven sites with identified and confirmed contamination from operations at the resort. The areas of contamination are listed as:

- **Site 1 Engineering and Maintenance Area**
- **Site 2 Engineering Area Former UST**
- **Site 3 Grounds and Landscaping Chemicals Storage Sheds**
- **Site 4 Grounds and Landscaping Equipment Maintenance Building**
- **Site 5 Emergency Generator Building**
- **Site 6 Waste Water Treatment Plant**
- **Site 7 Debris Landfill.**

Six of the sites have confirmed soil contamination with Site 2 being the only site confirmed with groundwater contamination. The chemicals of concern impacting soil at the above sites consist of pesticides, semi volatile organic compounds (SVOCs), silver, arsenic, barium, cadmium, PCBs, selenium, and mercury. These soil impacts exceed the US Environmental Protection Agency (EPA) Regional Screening Levels (RSLs) for soil screening protection of groundwater (SSL). Soil concentrations also exceed leachability criteria at these Sites; therefore, resulting in a potential for shallow groundwater environmental impacts. Groundwater contaminants of concern consists of

benzene, ethylbenzene, naphthalene, and 1- and 2-methylnaphthalene. These groundwater concentrations exceed their respective RSLs for tap water.

From and after the receipt of the environmental assessment reports it has been alleged that CBIA and EHIA would not allow access by the National Park Service to further determine the status of hazardous waste and environmental contamination at the Caneel site. There is no evidence that CBIA or EHIA allowed the Park Service to enter the site for the purpose of remediating the hazardous wastes. At a very minimum CBIA and EHIA, after receiving the three environmental reports, should have undertaken a full assessment of the site and conducted a hazardous waste determination. They did not.

It has been stated by Mr. Engle that CBIA and EHIA intend to do a rebuilding of the Caneel site but there is no indication that it would occur with a full environmental assessment and remediation. Such conduct violates RCRA and perhaps violates CERCLA and the Clean Water Act. A further environmental assessment would likely reveal that there has been no determination of whether the known or unknown waste on the site is hazardous, as RCRA requires. *See* 40 C.F.R. § 262.11.

CBIA and EHIA have claimed that they not responsible for environmental contamination at the Caneel site and they should not be responsible for remediation. However, there is no evidence of due diligence when they took over the Caneel property or that there was any subsequent environmental assessment or research of historical land use to prove such a claim.

CBIA and EHIA have already cleaned up a portion of the Caneel site after hurricanes Irma and Maria and have stated that they intend to rebuild the Caneel structures and have sought extensions of the RUE agreement to allow CBIA and EHIA to continue operations. Because CBIA and EHIA and the National Park Service are owners, operators, and generators of waste on the Caneel site as already documented by three environmental engineering reports, RCRA requires each of them to comply with federal laws and regulations. By failing to determine if the full extent of the hazardous waste under 40 C.F.R. § 262.11, the responsible parties have all but guaranteed that the continued activities at the site will violate a myriad of RCRA regulations.

Both the owner and operators of Caneel are potentially liable for RCRA violations. Here, the Department of the Interior, National Park Service as the supervising entity may be liable as the owner. The National Park Service, knowing there was documented environmental contamination, failed to take action to insure the contamination was properly remediated and failed to obtain additional environmental assessments of the Caneel site and therefore may be liable as a generator of hazardous and remediation waste because of a failure to follow requirements applicable to generators, and liable as the owner of a facility that has stored and disposed of hazardous waste without permits and in violation of statutory prohibitions and regulations. It should be noted that RCRA and CERCLA both have provisions making the acts applicable to federal facilities and Caneel is a federal facility.

IV. Activities on the Caneel Site May Present an Imminent and Substantial Endangerment to Health and the Environment

Your contributions to the past and present depositing, handling, storage, and disposal of solid and hazardous waste on the property may present an imminent and substantial endangerment to health and the environment. The property soil as was identified in the three environmental reports likely remains contaminated and is located next to beaches and waterways used by humans and wildlife. Further activities can release harmful soil contaminants into the air in the form of dust that can be inhaled and ingested and into the water. The users of this site, including tourists and island residents and visitors and may include from time to time infants, children, the elderly, pregnant and nursing women, and people with chronic illnesses who are all particularly vulnerable to the adverse health effects of toxic exposures. Most if not all of the contaminants identified in the engineering reports can have serious adverse health effects.

Your actions fail to ensure adequate safeguards and threaten human health and the environment.

I assert the following deficiencies as there has been:

1. No full waste characterization of all toxic substances and their leachates to determine the presence of a hazardous waste or hazardous waste constituent;
2. No human health and air or water quality assessments of the dispersion of all toxic substances present on site in the form of dust particles that can be released during the excavation and movement of contaminated soil;
3. No human health and water quality assessments of the discharge of all toxic substances present on site in storm water runoff that can occur presently and during the excavation and movement of contaminated soil;
4. No assessment of human health impacts of exposures to all toxic substances present on site via inhalation, skin contact, or ingestion for site workers, nearby residents, or visitors and staff who would occupy the site;
5. No assessment of human health impacts on persons vulnerable to toxic exposures, in particular infants, children, pregnant and nursing women, the elderly, and people with chronic illness;
6. No comprehensive surface water quality or subsurface assessment of all toxic substances present on the site where groundwater flows into the protected ocean waters adjacent to the site, and
7. No comprehensive assessment of the potential effect of allowing toxic substances, the full extent of which is unknown, to remain on the site where a new resort or resort support infrastructure is planned. Anticipated construction activities will likely release soil contaminants into the air and water. These activities could have devastating health effects on residents in the surrounding community and visitors to the site, in particular, infants, children, pregnant and nursing women, elderly people, and people with chronic illness. Workers employed in construction activities are also at great risk of toxic exposure.

To avoid the possible endangerment at issue, I urge you to immediately announce suspension of further activities on the Caneel site in order to:

(1) Consider a "no build" option as an alternative to the currently contemplated rebuilding of the Caneel structures;
(2) Ensure full compliance with RCRA, CERCLA and the Clean Water Act;
(3) Undertake a comprehensive and thorough hazardous waste determination of soil, surface and groundwater on the property and allow for split sampling with the EPA and a representative approved by the undersigned:
(4) Rigorously analyze the alternatives available for safe and effective environmental remediation of the site, including all risks and benefits reasonably presented by these alternatives;
(5) Present these alternatives and the plan for protecting residents of St John, the public and the adjacent waters from the threat of toxic exposure to contaminants on this property;
(6) Convene an open and transparent public participation process in the decision making regarding plans for handling the contamination and any proposed development on the property; and
(7) Select the best alternative and plan of action that protects human health and the environment.

EPA Intervention

I ask for the EPA to act as quickly as possible to assess the appropriateness of intervention and an enforcement action. The Caneel site is a Federal facility. RCRA confers penalty or order authority upon the EPA against federal facilities. The undersigned seeks enforcement actions for cleaning up the hazardous wastes determined to exist on the Caneel site after a full and complete assessment of the site including the areas where DDT and asbestos may exist. A private citizen should not have to take action to enforce laws the EPA and the Department of Interior are given the responsibility to enforce.

Persons Giving Notice

The full names and addresses of the person giving notice are as follows:

David R. DiGiacomo
10-1-3 Glucksberg
St. John, VI 00831

P.O. Box 37
St. John, VI 00831

Phone: 303 931 2554

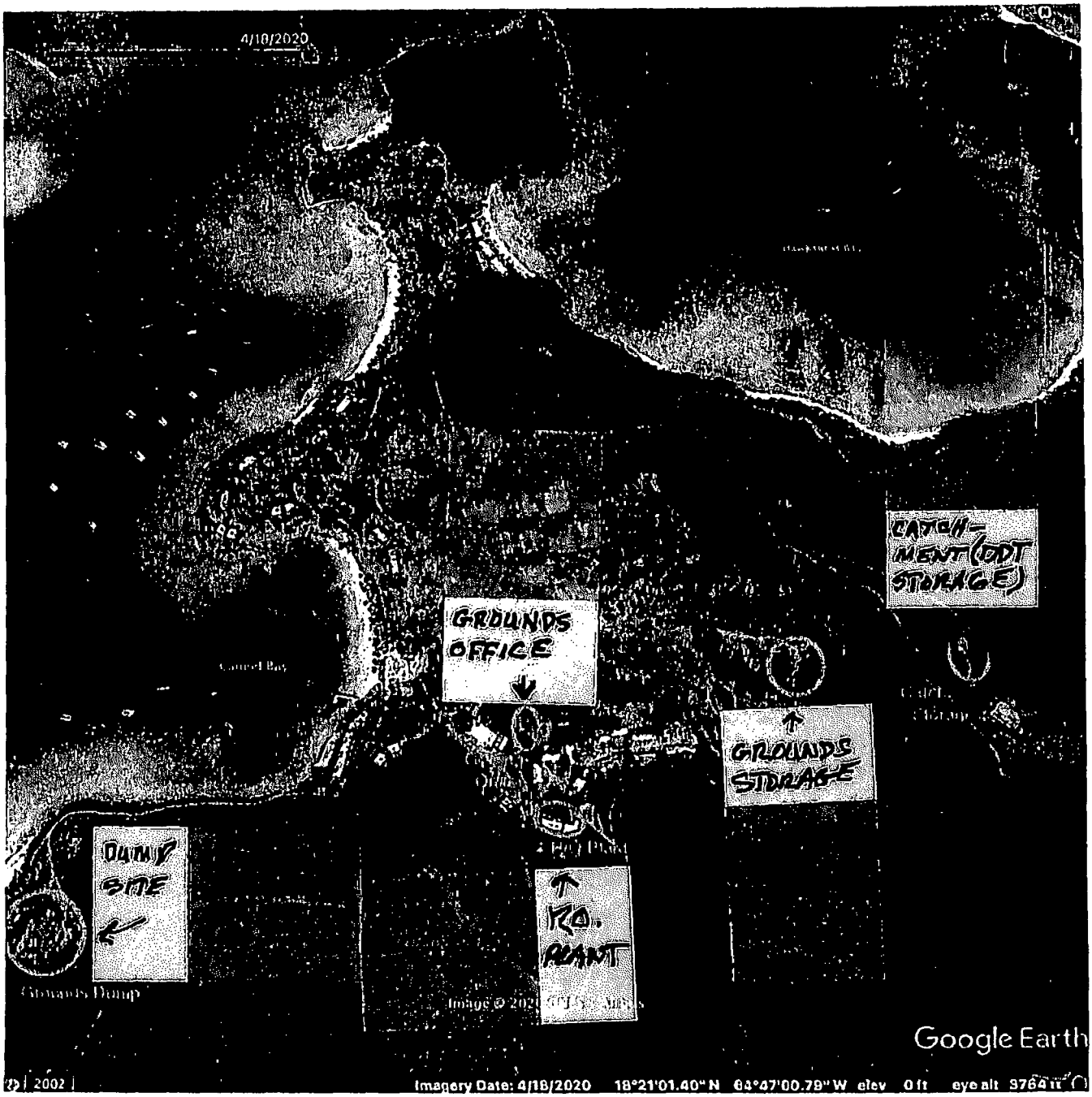
I have undertaken the giving of this notice without compensation or remuneration of any kind. This notice is not given on behalf of any organization or individual other than me.

I remain available to discuss a speedy, safe and just determination of the issues identified in this notice which could include a negotiated mutual agreement thereby avoiding litigation.

Sincerely yours,

David R. DiGiacomo

Exhibit 1
Caneel Site-U.S. Virgin Islands
Aerial Photo showing Catchment Storage Location



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ASSIGNMENT AND ASSUMPTION OF
RETAINED USE ESTATE

THIS ASSIGNMENT AND ASSUMPTION OF RETAINED USE ESTATE (the "Assignment"), made this day of April, 1986, by and between JACKSON HOLE PRESERVE, INCORPORATED, a New York not-for-profit corporation, having an office and business mailing address at Room 5510, 30 Rockefeller Plaza, New York, New York 10112, Assignor, and ROCKRESORTS, INC., a Delaware corporation, having an office and business mailing address at Room 5400, 30 Rockefeller Plaza, New York, New York 10112, Assignee,

W I T N E S S E T H :

WHEREAS by Indenture dated September 30, 1983 and recorded in the Recorder's Office for the District of St. Thomas and St. John, U.S. Virgin Islands, at Book 24-2, Page 359, Sub. No. 3402 on October 4, 1983 (the "Indenture") Assignor granted, sold, released and quitclaimed to the UNITED STATES OF AMERICA, acting by the Secretary of the Interior through the Director of the National Park Service, all of Assignor's right, title and interest in and to certain premises described in the Indenture (referred to therein and hereinafter as the "Premises"), which Premises are more particularly described in Schedule A attached hereto and hereby made a part hereof;

WHEREAS by the Indenture Assignor reserved to itself the exclusive right to use and occupy the Premises upon the terms and conditions set forth in the Indenture (such right referred to therein and hereinafter as the "Retained Use Estate") for a term which shall expire on September 30, 2023, unless earlier terminated as provided in the Indenture;

WHEREAS pursuant to that certain Caneel Bay Resort Purchase Agreement between Assignor and CSX CORPORATION of even date herewith (the "Purchase Agreement") Assignor has agreed, among other things, to assign to Assignee all of Assignor's right, title and interest in and to the Retained Use Estate, and Assignee has agreed to accept such assignment and to assume the obligations of Assignor with respect to the Retained Use Estate, upon the terms and conditions set forth therein;

WHEREAS under the Indenture Assignor may assign and transfer the Retained Use Estate if simultaneously therewith Assignee assumes the obligations of Assignor with respect thereto by instrument in form and substance satisfactory to the Secretary of the Interior, acting through the Director of the National Park Service;

WHEREAS the Secretary of the Interior has approved the assumption herein by Assignee of Assignor's obligations under the Indenture; and

WHEREAS there are currently located upon the Premises a total of one hundred seventy (170) "Guest Rooms," as hereinafter defined, of which twenty (20) are located upon Scott Beach and none are located upon Honeymoon Beach, and Assignor wishes to impose certain restrictions upon the number of Guest Rooms which may hereafter be located upon the Premises, including certain restrictions upon the number of Guest Rooms which may be located upon Scott Beach and Honey-

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moon Beach, and to impose certain restrictions upon the height of any building which may hereafter be located upon the Premises;

NOW, THEREFORE, in consideration of Ten Dollars ($10.00) and other good and valuable consideration, the receipt of which is hereby acknowledged, Assignor and Assignee hereby agree as follows:

1. Assignor assigns, transfers and sets over unto Assignee, its successors and assigns, all of Assignor's right, title and interest to use and occupy the Premises pursuant to, and all other rights granted or reserved to Assignor in, the Indenture, to have and to hold the same unto Assignee, its successors and assigns, from and after the date hereof, subject to the covenants, conditions, agreements, terms, obligations, restrictions, and other provisions set forth herein and in the Indenture.

2. Assignee accepts such assignment, and assumes *and agrees* to perform, discharge and comply with all of the covenants, conditions, agreements, terms, obligations and restrictions to be performed or complied with on the part of Assignor under the Indenture from and after the date hereof.

3. Assignee acknowledges and agrees that neither Assignor nor its agents, representatives or employees have made any representations or warranties with respect to this Assignment, the Premises or the Retained Use Estate except as specifically set forth and limited in the Purchase Agreement.

4. Assignee acknowledges that Assignor is committed to ensuring that any construction, addition, change, renovation, expansion or alteration of or to any building located from time to time upon the Premises will, to the extent feasible, preserve the natural condition of the Premises, and in order to induce Assignor to execute and deliver this Assignment, and as a material part of the consideration therefor, Assignee covenants as follows:

(a) Notwithstanding anything to the contrary set forth in the Indenture, prior to the expiration of the term of the Retained Use Estate or its earlier termination as provided in the Indenture, Assignee shall not carry out any construction, addition, change, renovation, expansion or alteration of or to any building located from time to time upon the Premises (any of the foregoing hereinafter referred to as "New Construction") which will result in any of the following:

(i) any building located from time to time upon the Premises having a height in excess of the "Permitted Height," as hereinafter defined (but it is understood that the fact that any building which is located upon the Premises on the date hereof has a height in excess of the Permitted Height shall not be considered a breach of this covenant),

(ii) the total number of Guest Rooms located from time to time upon the Premises as a whole exceeding three hundred seventy (370),

(iii) the total number of Guest Rooms located from time to time anywhere upon the Premises except Honeymoon Beach exceeding two hundred sixty-six (266),

(iv) the total number of Guest Rooms located from time to time upon Scott Beach exceeding forty-six (46), or

(v) the total number of Guest Rooms located from time to time upon Honeymoon Beach exceeding one hundred fifty (150).

Each of the foregoing covenants (i) through (v) is hereinafter referred to as a "Restrictive Covenant." The Restrictive Covenants may be modified only pursuant to a written instrument in form suitable for recordation and signed by Assignor and Assignee.

The term "Permitted Height" as used herein shall mean a height of:

(a) thirty (30) feet, in the case of a building containing one or more Guest Room(s) and having a pitched roof,

(b) twenty-five (25) feet, in the case of a building containing one or more Guest Room(s) and having a flat roof, or

(c) forty (40) feet, in the case of a building which does not contain any Guest Room(s),

such height measured, in every case, from the "Base Level" of such building, as hereinafter defined, to a level plane which intersects the highest point of the roof of such building.

The term "Base Level" as used herein shall mean a level plane which intersects the highest point of ground upon which the building is situated, provided, however, that in the case of a building located or proposed to be located in any area (I) which is now or hereafter designated as a floodplain by any agency or instrumentality of the United States of America or any state or territory thereof or any political subdivision of any such state or territory, or (II) which Assignor and Assignee may hereafter mutually agree to designate as a floodplain for purposes of this Assignment (an area designated under (I) or (II) above is hereinafter referred to as a "Floodplain"), "Base Level" shall mean that level plane which the Architect, as hereinafter defined, shall have reasonably determined is the level plane below which it is not prudent to construct the habitable portion of such building in view of the possibility of flooding. Notwithstanding the foregoing, in no event shall the height of any building located in a Floodplain exceed (A) thirty-five (35) feet, in the case of a building containing one or more Guest Rooms (regardless of the configuration of the roof of such building), or forty (40) feet, in the case of a building containing no Guest Rooms, such height measured, in every case, from a level plane which intersects the highest point of ground upon which such building is located to a level plane which intersects the highest point of the roof of such building.

The term "Architect" as used herein, shall mean a licensed architect, selected by Assignee and reasonably acceptable to Assignor, who is experienced in the design of buildings constructed in floodplain areas.

The term "Guest Room" as used herein shall mean a private bedroom, with or without private bathroom facilities,

generally available for hire as sleeping quarters by members of the general public, but shall not include any private sitting room, lobby, living area or other similar facility not generally available as sleeping quarters but which may be available for hire together with any such private bedroom.

An accurate delineation of the boundaries of Honeymoon Beach and Scott Beach for purposes of this Assignment is set forth on the map attached hereto as Exhibit A and hereby made a part hereof.

(b) Whenever Assignee proposes to undertake any New Construction which would either increase the total number of Guest Rooms then located upon the Premises, increase the height of any building which is located upon the Premises on the date hereof to a height in excess of twenty-five (25) feet, measured as hereinabove provided, or result in the construction of any new building having a height in excess of twenty-five (25) feet;-measured as hereinabove provided, then, at least thirty (30) business days prior to commencing any demolition, site preparation or other construction work in connection with such New Construction, Assignee shall deliver to Assignor written notice that Assignee proposes to undertake such New Construction, which notice shall include plans and specifications ("Plans") in sufficient detail to enable Assignor to determine whether the New Construction, if completed according to the Plans, would violate any Restrictive Covenant. If Assignor objects to such New Construction, Assignor shall give notice thereof to Assignee within twenty-five (25) business days after Assignor's receipt of the Plans, and if no such notice is given within such period, Assignor shall be deemed to have no such objection. Assignor shall have no right to object to any New Construction except on the ground that such New Construction would result in a breach of any Restrictive Covenant.

(c) In the event that:

(i) Assignee breaches or threatens to breach any Restrictive Covenant, and

(ii) either (A) Assignee shall have failed to give timely notice in accordance with Subparagraph 4(b) hereof in respect of the New Construction causing such breach or threatened breach, or (B) Assignor shall have given notice to Assignee that it objects to such New Construction in accordance with Subparagraph 4(b) hereof,

then Assignor shall have the right to obtain appropriate injunctive relief from a court of competent jurisdiction, including, subject to Subparagraph 4(e) hereof, an order requiring Assignee to restore the Premises to the condition in which they were prior to such breach, it being agreed that the rights of Assignor cannot otherwise be properly protected. For purposes of this Subparagraph 4(c), notice shall not be deemed to have been timely given by Assignee in accordance with Subparagraph 4(b) unless the New Construction, as completed, conforms substantially to the Plans delivered to Assignor in respect of such New Construction.

(d) In the event that:

(i) any New Construction shall result in a breach of any Restrictive Covenant, and

(ii) either (A) Assignee shall have failed to give timely notice to Assignor in accordance with Subparagraph 4(b) hereof in respect of the New Construction causing such breach, or (B) Assignor shall have given notice to Assignee that it objects to such New Construction in accordance with Subparagraph 4(b) hereof,

then Assignor shall be entitled to monetary damages from Assignee in an amount equal to the total cost incurred in the construction of the applicable portion of such New Construction, as follows:

(I) that portion of any building located upon the Premises which exceeds the Permitted Height of such building,

(II) each Guest Room completed anywhere upon the Premises after there are three hundred seventy (370) Guest Rooms located upon the Premises,

(III) each Guest Room completed anywhere upon the Premises except Honeymoon Beach after there are two hundred sixty six (266) Guest Rooms located anywhere upon the Premises except Honeymoon Beach,

(IV) each Guest Room completed upon Scott Beach after there are forty-six (46) Guest Rooms located thereon, and

(V) each Guest Room completed upon Honeymoon Beach after there are one hundred fifty (150) Guest Rooms located thereon,

provided, however, that the cost incurred by Assignee in constructing any particular Guest Room or portion thereof shall in no event be included more than once in determining the amount of damages to which Assignor shall be entitled hereunder. For purposes of this Subparagraph 4(d), notice shall not be deemd to have been timely given by Assignee in accordance with Subparagraph 4(b) unless the New Construction, as completed, conforms substantially to the Plans delivered to Assignor in respect of such New Construction. Assignee specifically acknowledges that it is not practical to ascertain the precise amount of Assignor's damages in the event of a breach of any Restrictive Covenant, that the foregoing method of determining Assignor's damages in such event reflects the critical importance to Assignor of Assignee's observance and performance of the Restrictive Covenants, and that the amount of damages so determined shall fairly and reasonably approximate Assignor's damages in such event.

(e) If Assignor shall have received monetary damages from Assignee pursuant to Subparagraph 4(d) hereof with respect to any New Construction which shall have resulted in a breach of any Restrictive Covenant, then Assignor shall not be entitled to obtain injunctive relief pursuant to Subparagraph 4(c) hereof requiring Assignee to remove such New Construction from the Premises.

5. This Assignment may not be modified, changed or supplemented, nor may any obligation hereunder be deemed waived, except by written instrument in form suitable for recordation and signed by Assignor and Assignee.

6. Any notice required to be given by either party to the other hereunder shall not be effective unless given in writing and delivered by hand or by an expedited or overnight courier service, or mailed by U.S. Postal Service certified or registered mail, return receipt requested, if to Assignor, to Assignor's address above written, and if to Assignee, to Assignee's address above written, with a copy to CSX Corporation, One James Center, Richmond, Virginia 23219, Attention: General Counsel. A notice so delivered or mailed shall be deemed given upon its receipt by or delivery to the party to which addressed. Either party may change the address to which notices shall be delivered or mailed by giving notice to the other party in the manner hereinabove described.

7. The covenants and agreements set forth herein shall be binding upon, and shall inure to the benefit of, the respective successors and assignees of Assignor and Assignee, as beneficiaries and holders of the rights and obligations relating to the Retained Use Estate set forth in the Indenture, provided any such assignee of Assignor shall be a non-governmental organization exempt from United States income taxation and which is engaged primarily in the preservation and protection of land in its natural condition for the enjoyment of the general public.

8. No subsequent assignment or transfer of the Retained Use Estate shall be effective to transfer any interest in the Retained Use Estate unless the assignee or transferee, in writing, shall expressly assume and agree to perform, discharge and comply with all of Assignee's covenants, conditions, agreements, terms and obligations hereunder, including, without limitation, the conditions of this Paragraph 8, arising from and after the date of such assignment or transfer. Upon such assignment or transfer Assignee shall be released from any and all liability under this Assignment arising from any act, omission or event first occuring on or after the effective date of such assignment or transfer.

IN WITNESS WHEREOF, Assignor and Assignee have each signed and sealed this Assignment as of the date and year first above written.

ASSIGNOR

JACKSON HOLE PRESERVE, INCORPORATED

ATTEST:

Franklin E. Parker
Secretary

By: George R. Lamb
George R. Lamb
Executive Vice President

ASSIGNEE

ROCKRESORTS, INC

ATTEST:

Secretary

By: Richard E. Holtzman
Richard E. Holtzman
President

1996 APR 10 AM 11:10

OFFICE OF THE RECORDER OF DEEDS
CHARLOTTE AMALIE
ST. THOMAS, VIRGIN ISLANDS

STATE OF NEW YORK)
: ss.
COUNTY OF NEW YORK)

The foregoing instrument was acknowledged before me this 3rd day of April, 1986, by George R. Lamb, Executive Vice President of Jackson Hole Preserve, Incorporated, a New York not-for-profit corporation, on behalf of the corporation.

JANE E. SCOTT NOTARY PUBLIC STATE OF NEW YORK

Jane E. Scott
Notary Public

JANE E. SCOTT
Notary Public, State of New York
No. 31-4833087
Qualified in New York County
Commission Expires March 30, 1987

STATE OF NEW YORK)
: ss.
COUNTY OF NEW YORK)

The foregoing instrument was acknowledged before me this 3rd day of April, 1986, by Richard E. Holtzman, President of Rockresorts, Inc., a Delaware corporation, on behalf of the corporation.

JANE E. SCOTT NOTARY PUBLIC STATE OF NEW YORK

Jane E. Scott
Notary Public

JANE E. SCOTT
Notary Public, State of New York
No. 31-4833087
Qualified in New York County
Commission Expires March 30, 1987

NOTED IN THE PUBLIC SURVEYOR'S RECORD FOR COUNTRY PROPERTY, BOOK FOR
ESTATE CANEEL BAY
NO. 8 CRUZ BAY QUARTER
ST. JOHN, VIRGIN ISLANDS

OFFICE OF PUBLIC SURVEYOR
ST THOMAS, VI April 8, 1986
Louis Olive, P.E.
Chief, Cadastral Survey Section

RECORDED IN THE RECORDER'S OFFICE FOR THE DISTRICT OF ST. THOMAS AND ST JOHN VIRGIN ISLANDS OF THE U.S.A. AND ENTERED IN BOOK 256 PAGE 264 NO. 1582 THE REAL (PERSONAL) PROPERTY RECORDS FOR QUARTER NO. 804 (AUXILARY Cruz Bay Rec.)
DATE: Apr. 10 1986
DISTRICT RECORDER OF DEEDS

OFFICE OF THE RECORDER
CHARLOTTE AMALIE
ST. THOMAS, VIRGIN ISLANDS
1986 APR 10 AM 11:10

SCHEDULE A

Land situated in the Island of St. John, U.S. Virgin Islands, described as

Remainder of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 127.7 acres, more or less, as shown on P.W.D. F9-122-T56 dated November 15, 1956, and more particularly described as follows:

1583(a)
1986

Beginning at the Bound Post of the Right of Way Line at Station 30 plus 68.0, on the North side of the Public Road from Cruz Bay to Caneel Bay, the line runs North 4 degrees 19 minutes West a distance 239.2 feet, more or less, along Parcel No. 13, to a bound post; thence turning and running North 63 degrees 46 minutes West a distance of 237.2 feet, more or less, along Parcel No. 13, to a bound post; thence turning and running North 24 degrees 00 minutes West a distance of Ca 84 feet, to the sea; thence turning and running in a general northeasterly direction a distance of Ca 5920 feet, along the sea, to the Southwesterly corner of Parcel No. 20 Estate Caneel Bay, thence turning and running South 87 degrees 05 minutes East a distance of 40 feet, more or less, along Parcel No. 20, to a bound post; thence turning and running South 87 degrees 05 Minutes East a distance of 193.4 feet, more or less, along Parcel No. 20; thence turning and running South 83 degrees 03 minutes East a distance of 260.0 feet, more or less, to a bound post; thence turning and running in a general Southernly direction a distance of Ca 2092 feet along the Right of Way to Hawknest Point, to the intersection of the right of way with the Public Road Right of Way from Caneel Bay to Trunk Bay; thence turning and running along the last mentioned right of way, in a general southernly direction a distance of Ca 1270 feet to a point on the right of way at Station 80 plus 69.0 feet of the Public Road from Cruz Bay to Caneel Bay; thence along this right of way to the point of beginning.

The above bounded tract contains 127.7 acres, more or less.

EXCEPTING AND RESERVING, however, from said Remainder of Estate Caneel Bay No. 8 Cruz Bay Quarter, Parcel No. "A", Estate Caneel Bay, 8 Cruz Bay Quarter, St. John, Virgin Islands, as delineated on Public Works Drawing No. G3-110-T64, comprising 2,456 square feet more or less, being the premises conveyed by Caneel Bay Plantation Inc. to Government of the Virgin Islands by Quitclaim Deed dated August 22, 1966, recorded July 5, 1967 in Book 8-W, page 382, as Document No. 3262/1967, in exchange for which parcel the Government of the Virgin Islands quitclaimed an area of public road designated as Parcel "C" in PWD G3-110-T64, dated October 16, 1964, comprising an area of 1,300 square feet, more or less, by deed dated June 1, 1967, recorded July 5, 1967, in Book 8-W, page 384, as Document No. 3261/1967. The said Parcel "C" is hereby included as a portion of the Premises.

All distances are in English Feet, and all bearings are related to the survey of Caneel Bay as shown on P.W. Drawing B-3-120 T-39, dated August 11, 1939,

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except the bearings along Parcel No. 20, which are related to the survey of Parcel 20.

Parcel No. 9 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 6.17 acres, more or less, as shown on P.W.D. D9-125-T56 dated November 11, 1956 and more particularly described as follows:

Beginning at a bound post on the north side of the Public Road from the Caneel Bay - Trunk Bay Road to the Center Line Road, the line runs in a general southeasterly direction a distance of Ca 710 feet, along the Public Road, to a bound post, the straight line bearing and distance between these points being South 26 degrees 54 minutes East a distance of 671.8 feet, more or less; thence turning and running in a general southernly and easternly direction a distance of Ca 855 feet, along the Public Road, to a bound post, the straight line bearing and distance between these points being South 42 degrees 35 minutes East a distance of 788.5 feet, more or less; thence turning and running North 26 degrees 38 minutes East a distance of 82.1 feet, more or less, along the Public Road, to a bound post; thence turning and running North 11 degrees 50 minutes East a distance of 100.0 feet, more or less, to a bound post; thence turning and running North 14 degrees 04 minutes West a distance of 229.5 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running South 25 degrees 13 minutes West a distance of 50.0 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 47 degrees 42 minutes West a distance of 370.4 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running by the following courses and distances; North 37 degrees 43 minutes West - 106.1 feet, more or less; North 4 degrees 45 minutes West, 175.4 feet, more or less; North 47 degrees 28 minutes West - 326.2 feet, more or less; North 58 degrees 31 minutes West - 158.3 feet, more or less; North 77 degrees 29 minutes West - 91.4 feet, more or less, along Parcel No. 8 to the point of beginning.

The above bounded Parcel contains 6.17 acres, more or less.

All distances are in English feet, and all bearings are related to the survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 10 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 0.584 acre more or less as shown on P.W.D. F9-119-T56 dated November 15, 1956 and more particularly described as follows:

Beginning at a bound post at the intersection of the Public Roads, from Cruz Bay to Trunk Bay and the Road from this Road to the Public Road, the line runs South 13 degrees 42 minutes West a distance of 143.5 feet, more or less, along the Public Road to a bound post; thence turning and running South 14 degrees 25 minutes East a distance of 33.3 feet, more or less, along the Public Road, to a bound post; thence turning and running South 46 degrees 53 minutes East a distance of 103.7 feet,

more or less, along the Public Road, to a bound post opposite to Station 80 plus 69.0 on the relocation of the Public Road from Cruz Bay to Caneel Bay, thence turning and running South 38 degrees 55 minutes East a distance of 50.0 feet, more or less, along the Public Road, to a bound post; thence turning and running North 64 degrees 59 minutes East a distance of 14.9 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 4 degrees 28 minutes East a distance of 191.4 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 52 degrees 33 minutes West a distance of 139.4 feet, more or less, along the Public Road to the Center Line Road, to the point of beginning.

The above bounded tract contains 0.584 acres, more or less.

All distances are in English feet, and all bearings are related to the Survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 11 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 1.594 acres, more or less, as shown on P.W.D. F9-121-T56 dated November 15, 1956 and more particularly shown as follows:

Beginning at a bound post of the south side of the Public Road from Cruz Bay to Caneel Bay and opposite Station 70 plus 76.0, the line runs South 55 degrees 08 minutes East a distance of 322.9 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running South 71 degrees 58 minutes East a distance of 214.0 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 58 degrees 44 minutes East a distance of 67.7 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 30 degrees 18 minutes West a distance of 260.2 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 54 degrees 44 minutes West a distance of 99.9 feet, more or less, to a bound post opposite to Station 74 plus 02.0 on the Center Line of the Public Road from Cruz Bay to Caneel Bay; thence along the Right of Way in a general Westerly direction to the point of beginning.

The above bounded tract contains 1.594 acre, more or less.

All distances are in English feet, and all bearings are related to the Survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 20 of Estate Caneel Bay (formerly Parcel No. 8) no. 8 Cruz Bay Quarter, St. John, V.I. containing 9.3 acres, more or less, as shown on P.W.D. D9-25-T51 dated April 2, 1951, and more particularly described as follows:

Parcel No. 20, formerly Parcel No. 8 consisting of two lots separated by a 25-ft. right of way, one bounded by a line starting at a tree growing on

the rocks at the North end of the beach and following a fence running South 40 degrees 18 minutes West for a distance of 64.8 feet, more or less; thence South 19 degrees 34 minutes West for a distance of 58.3 feet, more or less; thence South 13 degrees 11 minutes West for a distance of 61.1 feet, more or less, to a concrete bound post; thence North 83 degrees 03 minutes West for a distance of 159.2 feet, more or less, to a concrete bound post; thence North 3 degrees 09 minutes West for a distance of 256.2 feet, more or less, to a concrete bound post; thence on a curve to the right of 95-ft. radius for a distance of 69.5 feet, more or less, to a concrete bound post; thence North 38 degrees 40 minutes East for a distance of 57.6 feet, more or less, to a concrete bound post and thence South 40 degrees 59 minutes East for a distance of 291.3 feet, more or less, to the point of beginning. The second lot is bounded by a line starting at a concrete bound post, a distance of 25.4 feet, North 83 degrees 03 minutes West from the second bound post mentioned in the preceding paragraph and runs North 83 degrees 03 minutes West for a distance of 260.0 feet, more or less, to a concrete bound post; thence North 87 degrees 05 minutes West for a distance of 193.4 feet, more or less, to a concrete bound post and through that bound post in the same direction for a distance of approximately 40 feet to the water's edge; thence following the water's edge in a northerly and then in a southeasterly direction for a distance of approximately 860 feet, and thence southwesterly for a distance of approximately 25 feet to a concrete bound post at the top of the bank;

thence South 41 degrees 50 minutes East for a distance of 76.4 feet, more or less, to a concrete bound post; thence following approximately the shoreward edge of a line of sea grape trees, North 76 degrees 24 minutes East for a distance of 171.3 feet, more or less, and then North 57 degrees 55 minutes East for a distance of 199.5 feet, more or less, to a concrete bound post; thence South 70 degrees 11 minutes East for a distance of 144.6 feet, more or less, to a concrete bound post; thence South 40 degrees 59 minutes East for a distance of 230.7 feet, more or less, to a concrete bound post; thence South 38 degrees 40 minutes West for a distance of 60.8 feet, to a concrete bound post; thence on a curve to the left of 120-ft. radius a distance of 82.7 feet, more or less, to a concrete bound post and thence South 3 degrees 09 minutes East for a distance of 252.2 feet, more or less, to the point of beginning.

The whole parcel contains an area of 9.3 acres, more or less.

Parcel No. 21 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I., containing 0.85 acres, more or less, as shown on P.W.D. G9-44-T51 dated June 27, 1951, revised September 30, 1951 and more particularly described as follows:

Beginning at the bound post at the Northwestern corner of Parcel No. 22, Estate Caneel Bay the line

runs in a general Northerly direction a distance of 356 feet, more or less, along an access road to a bound post; thence turning and running South 83 degrees 05 minutes East a distance of 152 feet, more or less, along a 15 foot freeway to a boundpost; thence turning and running on a general Southerly direction, a distance of 280 feet more or less, along a line 20 feet above high water mark to a concrete post; thence turning and running South 70 degrees 40 minutes West a distance of 143.5 feet, more or less, along Parcel 22 Caneel Bay to the point of beginning.

The above bounded tract contains 0.85 acres, more or less.

All distances are in English feet as determined by the stadia method and all bearings are related to the magnetic meridian.

Parcel No. 22 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I., containing 1.42 acres more or less, as shown on P.W.D. G9-45-T51 dated June 27, 1951 and more particularly described as follows:

Beginning at the boundpost at the Southeast corner of Parcel No. 21 of Estate Caneel Bay, the line runs in a general Southeasterly direction along the brush line, a distance of 205 feet, more or less, to a concrete boundpost, thence turning and running South 54 degrees 45 minutes West a distance of 273 feet, more or less, to a boundpost; thence turning and running North 36 degrees 20 minutes West a distance of 157 feet, more or less, along parcel No. 23 to a boundpost; thence turning and running in a general Northeasterly direction along the access Road a distance of 195 feet, more or less, to a boundpost;

thence turning and running North 70 degrees 40 minutes East a distance of 143.5 feet, more or less, along Parcel No. 21 to the point of beginning.

The above bounded tract contains 1.42 acres, more or less.

All distances are in English feet as determined by the Stadia method and all bearings are related to the magnetic meridian.

Parcel No. 52A Estate Caneel Bay, No. 2 Cruz Bay Quarter, as shown on P.W.D. D9-289-T61 dated December 6, 1961 and more particularly described as follows:

Beginning at a bound post situated south 77 degrees 13 minutes East, a distance of 188.0 feet more or less from a bound post at the southwest corner of Lot No. 52, the line runs North 12 degrees 52 minutes East, a distance of 185.4 feet more or less to a bound post; thence continuing in the same direction a distance of 2.1 feet more or less to a point; thence turning and running South 76 degrees 37 minutes East, a distance of 235.3 feet more or less to a bound post; thence turning and running

South 12 degrees 30 minutes 30 seconds West, a distance of 185.1 feet more or less to a bound post; thence turning and running North 77 degrees 13 minutes West, a distance of 236.45 feet more or less to the point of beginning.

The above bounded tract contains 1.00 acres more or less.

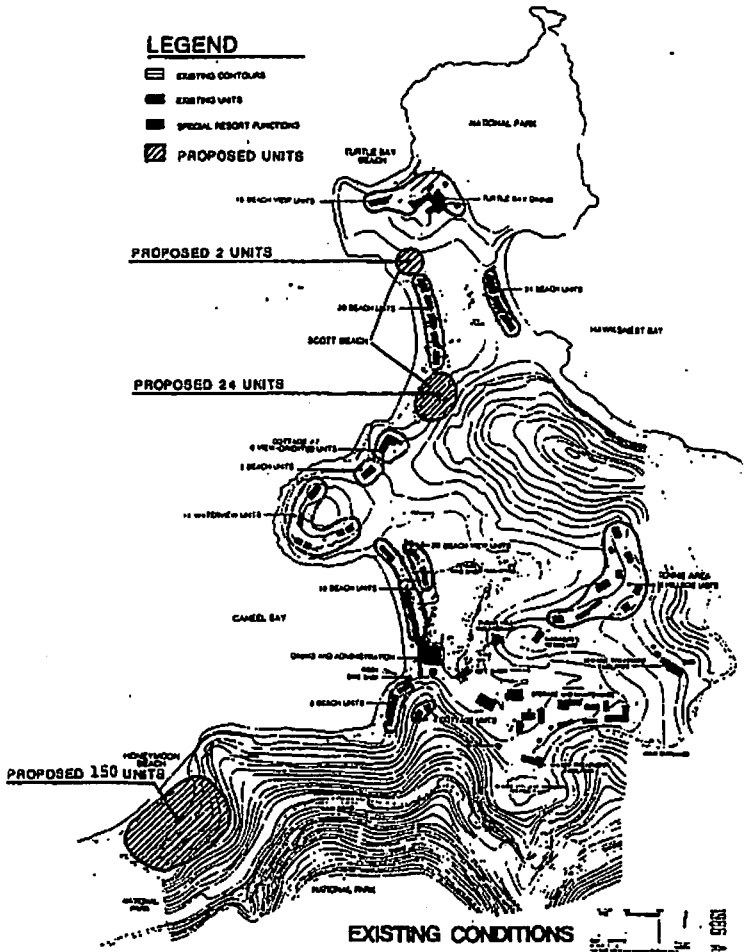
RECORDED [redacted] IN THE RECORDER'S OFFICE FOR THE DISTRICT OF ST. THOMAS AND ST. JOHN VIRGIN ISLANDS OF THE U.S.A. BOOK 265 PAGE 364 PLUS NO. 15520 AND ENTERED IN THE REAL (PERSONAL, PROP. & T. REGISTER FOR _____ QUARTER NO. _____ (AUXILARY Cruz Bay Reg. 305

DATE: APR. 10 1986

DISTRICT RECORDER OF DEEDS

OFFICE OF THE RECORDER OF DEEDS
CHARLOTTE AMALIE
ST. THOMAS, U.S. VIRGIN ISLANDS
1986 APR 10 AM 11:10

EXHIBIT A



EDWARD D. STONE JR. & ASSOC., P.A.
Planners and Landscape Architects
March 27, 1986
Map of Caneel Bay Area at St. John, United States Virgin Islands prepared from an aerial photograph, showing schematically areas of Scott Beach and Honeymoon Beach proposed to be used for expansion of guest units

P.O. BOX NO. 2515

TRD-RC-712

GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES
CHARLOTTE AMALIE, ST. THOMAS, V.I. 00801

DEPARTMENT OF FINANCE
TREASURY DIVISION

TO: THE RECORDER OF DEEDS

FROM: THE TREASURY DIVISION

IN ACCORDANCE WITH Title 28, SECTION 121 AS AMENDED,

THIS IS CERTIFICATION THAT THERE ARE NO REAL PROPERTY

TAXES OUTSTANDING FOR Jackson Hole Preserve

Caneel Bay (PARCEL NO. 3-06-02-0101-00

Mill Ruins).

RESEARCHED BY: [signature]
TITLE: Enforcement Officer III
DATE: April 9, 1986

VERIFIED BY: [signature]
TITLE: Chief Law Enf.
DATE: 4/9/86
COLLECTOR NO. 03

878

P. O. BOX NO. 2515

TRD-RC-712

GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES
CHARLOTTE AMALIE, ST. THOMAS, V.I. 00801

DEPARTMENT OF FINANCE
TREASURY DIVISION

TO: THE RECORDER OF DEEDS

FROM: THE TREASURY DIVISION

IN ACCORDANCE WITH Title 28, SECTION 121 AS AMENDED,

THIS IS CERTIFICATION THAT THERE ARE NO REAL PROPERTY

TAXES OUTSTANDING FOR Jackson Hole Preserve

9 Caneel Bay (PARCEL NO. 3-06101-0106-00
10 Caneel Bay 3-06101-0201-00
11 Caneel Bay 3-06101-0202-00
).

RESEARCHED BY: Stanley Jarvis
TITLE: Enforcement Officer II
DATE: April 8, 1986

VERIFIED BY: [signature]
TITLE: Chief, Revenue Collection
DATE: April 8, 1986
COLLECTOR NO. 01

279

P.O. BOX NO. 2515

TRD-.. -712

GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES
CHARLOTTE AMALIE, ST. THOMAS, V.I. 00801

DEPARTMENT OF FINANCE
TREASURY DIVISION

TO: THE RECORDER OF DEEDS

FROM: THE TREASURY DIVISION

IN ACCORDANCE WITH Title 28, SECTION 121 AS AMENDED,

THIS IS CERTIFICATION THAT THERE ARE NO REAL PROPERTY

TAXES OUTSTANDING FOR Jackson Hole Preserve

20 Caneel Bay (PARCEL NO. 3-03704-0202-00
21 Caneel Bay 3-03704-0301-00
22 Caneel Bay 3-03704-0302-00
).

RESEARCHED BY: [signature]
TITLE: Enforcement Officer II
DATE: April 8, 1986

VERIFIED BY: [signature]
TITLE: Chief, Revenue Collection
DATE: April 8, 1986
COLLECTOR NO. 01

280

TRD-RC-712

P.O. BOX NO. 2515

GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES
CHARLOTTE AMALIE, ST. THOMAS, V.I. 00801

DEPARTMENT OF FINANCE
TREASURY DIVISION

TO: THE RECORDER OF DEEDS

FROM: THE TREASURY DIVISION

IN ACCORDANCE WITH Title 28, SECTION 121 AS AMENDED,

THIS IS CERTIFICATION THAT THERE ARE NO REAL PROPERTY

TAXES OUTSTANDING FOR Jackson Hole Preserve

52A Caneel Bay (PARCEL NO. 3-06101-0102-00

).

RESEARCHED BY: Stanley Lawrence

TITLE: Enforcement Officer II

DATE: April 8, 1986

VERIFIED BY: Ilva M. Q.

TITLE: Chief, Revenue Collection

DATE: April 8, 1986

COLLECTOR NO. 01

281

VIIS 01-106, 01-107, 01-109, 01-111, 01-112, 01-113, 01-11

JACKSON HOLE PRESERVE, INCORPORATED

to

UNITED STATES OF AMERICA

3402/1983

INDENTURE

THIS INDENTURE, made as of September 30, 1983 between JACKSON HOLE PRESERVE, INCORPORATED, a not-for-profit corporation organized and existing under the laws of the State of New York and having its principal office at 30 Rockefeller Plaza, New York, New York ("Grantor"), and the UNITED STATES OF AMERICA, acting by the Secretary of the Interior through the Director of the National Park Service ("Grantee");

WITNESSETH: That for and in consideration of One ($1.00) Dollar and other good and valuable consideration, paid by Grantee to Grantor, the receipt and sufficiency of which is hereby acknowledged;

GRANTOR HEREBY GRANTS, SELLS, RELEASES, AND QUIT-CLAIMS to Grantee all of Grantor's right, title, and interest in and to the following premises (collectively the "Premises"):

(A) the land, including the landscaping, walkways, roads, road systems, and automobile parking areas situated thereon, described in Schedule A annexed hereto and made a part hereof, being a part of the premises conveyed by Caneel Bay, Inc. to Grantor by Deed dated December 29, 1977 and recorded January 24, 1978 as Document No. 158 in Volume 18-0 Page 121 in the Office of the Recorder of Deeds for the District of St. Thomas and St. John, Virgin Islands of the United States ("Prior Deed"), but exclusive of all other improvements thereon as excepted and reserved by Caneel Bay, Inc. in the Prior Deed (the "Improvements"); and

(B) the land constituting Parcel No. 52A Estate Caneel Bay Number 2, Cruz Bay Quarter, St. John, Virgin Islands, described in Schedule B annexed hereto and made a part thereof, being the premises conveyed by Gustov Stark and Charlotte Dean Stark to Grantor by deed dated January 31, 1962 and recorded February 5, 1962 as document number 236 in the office of the Recorder of Deeds for the District of St. Thomas and St. John, Virgin Islands of the United States, but exclusive of all improvements thereon;

TOGETHER WITH all right, title, and interest of Grantor in and to all rights, easements, privileges, rights-of-way, and appurtenances belonging or pertaining to the Premises or used in connection therewith or for the benefit thereof;

RESERVING, however, unto Grantor the exclusive right to use and occupy the Premises (the "Retained Use Estate") upon the following terms and conditions:

VIRGIN ISLANDS NP DEED NO. 64

1. Term of Retained Use Estate. Subject to the right of Grantor to terminate the Retained Use Estate pursuant to paragraph number 8 below, the Retained Use Estate shall continue for a term of forty (40) years from the date hereof.

2. Maintenance of Premises by Grantor Prior to Termination of Retained Use Estate. It is Grantor's expectation and intention that at some future time, to be determined by Grantor pursuant to the provisions set forth herein, the Retained Use Estate will be terminated and extinguished in order to carry out the longstanding objective of Grantor that the Premises ultimately be an integral part of the Virgin Islands National Park (the "Park") under the jurisdiction of the Secretary for the use and enjoyment by visitors to the Park of the outstanding scenic and other features of national significance located both within the Premises and in other areas of the Park. In keeping with this objective, Grantor agrees that, at all times prior to the termination of the Retained Use Estate pursuant to paragraph numbered 8 below Grantor will use and maintain the Premises in such a manner that will (a) be consistent with the preservation of such outstanding scenic and other features of national significance and (b) preserve the Premises to the extent feasible in their natural condition for the public benefit, enjoyment and inspiration, subject, however, to the right of Grantor to operate guest facilities for the accommodation of visitors to the Park on the Premises as provided for in paragraph numbered 3 below.

3. Grantor's Right to Operate or Provide for the Operation of Guest Facilities on the Premises. Consistent with its obligation with respect to the maintenance of the Premises set forth in paragraph numbered 2 above, Grantor intends, and shall have the right prior to any termination of the Retained Use Estate pursuant to paragraph numbered 8 below, to operate on the Premises guest facilities for the accommodation of visitors to the Park (including, without limitation, facilities for lodging and meals and other facilities and services of such types as may be appropriate for the accommodation of such visitors) and may conduct such related activities as Grantor deems advisable for the benefit of guests at such facilities. The operation of such guest facilities and conduct of such related activities may be carried on by Grantor either directly or through any subsidiary or indirectly through any other person selected by Grantor and in each case in such manner as Grantor deems necessary or advisable, without authoritative control or oversight by the Secretary, and prior to the termination of the Retained Use Estate pursuant to paragraph numbered 8 below Grantee shall have no responsibility with respect to the protection of visitors to the premises. Prior to any termination of the Retained Use Estate Grantor shall have sole discretion as to (a) the rates to be charged for the use of such facilities (including the rates for lodging, meals, and other facilities and services), (b) the location of such facilities and the nature, design, and construction thereof, (c) the determination of the persons to whom and the times at which such facilities are made available (provided, however, that the facilities shall be made avail-

able at all such times to all persons without discrimination or segregation on the ground of race, color, religion or national origin, in compliance with Section 201 of the Civil Rights Act of 1964), and (d) the addition to or removal or replacement of any facilities.

4. Grantor's Right to Add to and Alter Improvements. Grantor shall have the right to make, at its sole cost and expense and at any time, such additions, changes, renovations, and alterations, whether structural or otherwise, in or to the Premises and any improvements from time to time located on the Premises (including the Improvements) as Grantor shall, in its sole discretion, deem necessary or advisable.

5. Insurance to be Provided by Grantor. At all times prior to any termination of the Retained Use Estate pursuant to paragraph numbered 8 below Grantor, for the benefit of Grantor and Grantee, shall cause a policy or policies of public liability insurance to be maintained in respect of the Premises having limits of coverage which shall be not less than those maintained by or for the benefit of owners of real property in the United States Virgin Islands comparable in size and use to the Premises and such improvements. Grantor shall use its best efforts to cause Grantee to be named as a third party beneficiary as its interest may appear in each policy of public liability insurance so maintained.

6. Grantor's Right to Assign and Transfer, and to Mortgage, Retained Use Estate. Grantor may at any time without the approval of Grantee:

(i) assign and transfer the Retained Use Estate to any person (whether an individual, a corporation, or any other form of business entity); provided however, that any person to whom the Retained Use Estate may be assigned and transferred shall, simultaneously with such assignment and transfer, assume, by instrument in form and substance reasonably satisfactory to the Secretary, all of the obligations of Grantor set forth (a) in the second sentence of paragraph numbered 2 and in paragraph numbered 5 above and (b) if, simultaneously with such assignment and transfer by Grantor to such person of the Retained Use Estate, Grantor shall convey and transfer to such person all of its fee title in and to the improvements then located on the Premises (including the Improvements) title to which has not prior thereto been conveyed and transferred to Grantee, such person shall, by similar instrument, assume the obligations of Grantor in the second sentence of paragraph numbered 8, and upon such an assignment, transfer and assumption Grantor shall be relieved of all obligations hereunder; and

(ii) grant to any person (whether an individual, a corporation , or any other form of business entity) a mortgage or mortgages upon the Retained Use Estate and in connection therewith assign to the mortgagee(s) the Retained Use Estate. The mortgagee under any such mortgage shall not be personally liable for the obligations of Grantor hereunder unless and until the mortgagee becomes the owner of the Retained Use Estate and shall remain liable for such obligations only so long as it shall be the owner of the

Retained Use Estate. If Grantee is given the name and address of the mortgagee, Grantee shall give the mortgagee, by certified mail, a copy of any notice given by Grantee to Grantor of a default with respect to an obligation of Grantor hereunder. After receipt by the mortgagee of any such notice of default, the mortgagee shall be allowed such period of time as may be reasonably required to cure the default specified in such notice or to institute and complete proceedings for the foreclosure of such mortgage, and if the mortgagee is diligently proceeding to cure such default or to obtain possession of the Premises, neither Grantor nor Grantee shall terminate the Retained Use Estate. Upon a foreclosure of any such mortgage Grantee shall recognize the mortgagee or such other person or persons as may purchase the mortgagee's interest in the Retained Use Estate at a foreclosure sale as the owner of the Retained Use Estate. The mortgagee may be named as one of the insureds under fire and other hazard insurance policies maintained by Grantor with respect to the Premises and Improvements and any such mortgage may provide for the disposition of the proceeds under such insurance policies which may be otherwise payable directly to Grantor. So long as a mortgage of the Retained Use Estate is in effect, unless the mortgagee consents thereto, no provision herein relating to the Retained Use Estate shall be amended, the Retained Use Estate shall not be terminated, and fee title to the land and title to the Retained Use Estate shall not merge.

7. Appointment by Grantor of Operator of Guest Facilities. Grantor shall have the right at any time and from time to time to appoint any person (whether an individual, a corporation, or any other form of business entity) to operate the guest facilities now or hereafter located on the Premises for the accommodation of visitors to the Park and to oversee the management of the Premises and any improvements located thereon, and in such event the person so appointed shall enjoy all of the rights reserved to Grantor hereunder; provided, however, that in such event Grantor shall nevertheless remain liable for all of the obligations of the Grantor set forth herein. The Secretary, upon the acceptance of this Deed, hereby acknowledges that Caneel Bay, Inc., a U.S. Virgin Islands corporation having a principal office at Estate Caneel Bay, St. John, U.S. Virgin Islands, is on the date hereof the operator of the guest facilities now located at the Premises.

8. Termination by Grantor of Retained Use Estate. Grantor may, upon one (1) year's prior written notice mailed or delivered to the Secretary, terminate and extinguish the Retained Use Estate on a specified date (the "Termination Date"), provided, however, that the Termination Date shall not be prior to three (3) years from the date hereof. Such notice of termination shall include an offer by Grantor to convey and transfer to Grantee as of the Termination Date fee title in and to all improvements located on the Premises (including the Improvements) title to which has not previously been conveyed and transferred to Grantee, and shall be accompanied by the form of an instrument to effect such conveyance and transfer which Grantor will execute and deliver upon acceptance by Grantee of such offer. All mortgage liens on the Retained Use Estate and the Improvements must be satisfied or discharged prior to conveyance thereof

to Grantee. At any time after receipt of such notice of termination, but in no event later than one hundred eighty (180) days prior to the Termination Date, the Secretary shall mail or deliver to Grantor a written notice advising whether Grantee is willing to accept such conveyance and transfer. In the event that the Secretary (1) advises Grantor that Grantee is willing to accept such conveyance, and (2) determines, at any time within a period of one year following the termination of the Retained Use Estate by Grantor pursuant to this paragraph 8, that public accommodations, facilities, and services should continue to be made available to the public within the Park on the Premises by persons other than Grantee, the Secretary shall advise Grantor or its successors of such determination and shall provide a reasonable opportunity for Grantor, its subsidiaries, affiliates or successors to provide the same. For this purpose "reasonable opportunity" shall mean an opportunity, pursuant to the procedures then applicable, including competitive bidding, to provide the same in such form as is then generally utilized by Grantee to authorize public accommodations, facilities or services in areas operated as part of the national park system administered by Grantee.

TO HAVE AND TO HOLD the Premises in fee simple forever.

SUBJECT, HOWEVER, to existing covenants, easements, restrictions, and leases.

The Premises are conveyed upon the condition that if (A) the Premises or any part thereof shall at any time cease to be included within the Park or (B) in connection with a termination of the Retained Use Estate pursuant to paragraph numbered 8 above, Grantee shall have advised Grantor pursuant to the provisions of that paragraph that Grantee is not willing to accept a conveyance of fee title to the improvements located on the Premises (including the Improvements), then upon the occurrence of either such event (a) title to the Premises or such part thereof, as the case may be, shall revert, automatically and without further deed, to (i) Grantor or any successor to Grantor or (ii) if Grantor or such a successor shall not then exist, the National Park Foundation, a corporation incorporated under United States law, or any successor thereto or (iii) if said Foundation or such a successor shall not then exist, another organization selected by the Secretary which is exempt from United States income taxation and which is engaged primarily in the preservation and protection of land in its natural condition for the enjoyment of the general public (such corporation or other organization hereinafter referred to as the "Revertee"); and (b) Grantee shall execute and deliver to the Revertee an instrument, in form suitable for recordation and indexing in the appropriate recording system and in form and substance reasonably acceptable to the Revertee, referring to the aforesaid provision for automatic reversion of title and evidencing that one of the events described in the foregoing clauses (A) and (B) has occurred, and the Revertee shall have the right to reenter and repossess the Premises, or such part thereof, and shall have all rights of ownership with respect thereto.

This conveyance is by way of gift, without consideration except the nominal consideration hereinabove recited, and is made without warranty of any kind. This Indenture shall be effective as of September 30, 1983.

IN WITNESS WHEREOF, Grantor has caused these presents to be executed by its officers thereunto duly authorized and its corporate seal to be hereunto affixed as of the day and year first above written.

(CORPORATE SEAL)

JACKSON HOLE PRESERVE, INCORPORATED

Franklin E. Parker
Secretary

By: Laurance S. Rockefeller
President

Signed, sealed and delivered in the presence of:

State of NEW YORK)
: ss.:
County of NEW YORK)

On this 13th day of September, 1983 before me appeared Laurance S. Rockefeller to me personally known, who, being duly sworn, did say that he is the President of Jackson Hole Preserve, Incorporated, a corporation, and that the seal affixed to this instrument is the corporate seal of said corporation and that said instrument was signed and sealed on behalf of said corporation by authority of its Board of Trustees, and said President acknowledged said instrument to be the free act and deed of said corporation.

Given under my hand and notarial seal this 13th day of September, 1983.

(NOTARY SEAL)

Ruth C. Haupert
NOTARY PUBLIC
RUTH C. HAUPERT
Notary Public, State of New York
No. 41-4640601
Qualified in Queens County
Certificate Filed in New York County
Commission Expires March 30, 1985

NOTED IN THE PUBLIC SURVEYOR'S RECORD FOR COUNTRY PROPERTY, BOOK FOR ESTATE CANEEL BAY, NO. 8 CRUZ BAY QUARTER, ST. JOHN, VIRGIN ISLANDS.

OFFICE OF PUBLIC SURVEYOR ST. THOMAS, V.I. Oct. 4, 1983.

Louis M. Harrigan
PUBLIC SURVEYOR

RECORDED AND RERECORDED IN THE RECORDER'S OFFICE FOR THE DISTRICT OF ST. THOMAS AND ST. JOHN, VIRGIN ISLANDS OF THE U.S.A. AND ENTERED IN BOOK A-44, PAGE 339 SUB NO. 3402 THE REAL (PERSONAL) PROPERTY REGISTER FOR Cruz Bay QUARTER NO. 44 PAGE 3 194 + 330 + 304

DATED October 4 19 83

Notary Public Marie T. Barr
DISTRICT RECORDER OF DEEDS

RECORDER OF DEEDS
'83 OCT 4 AM 11 28

UNITED STATES
DEPARTMENT OF THE INTERIOR
WASHINGTON

The within Indenture is hereby agreed to and accepted on behalf of the United States of America, Department of the Interior, National Park Service, by the Director, Russell E. Dickenson, under the authority contained in the Act approved August 2, 1956 (70 Stat. 940) and pursuant to the Authority delegated in the Department Manual, Part 245 DM 1.1 A.

Dated: Sept. 22, 1983

Russell E. Dickenson

Russell E. Dickenson, Director,
National Park
Service

SCHEDULE A

Land situated in the Island of St. John, U.S. Virgin Islands, described as

Remainder of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 127.7 acres, more or less, as shown on P.W.D. F9-122-T56 dated November 15, 1956, and more particularly described as follows:

Beginning at the Bound Post of the Right of Way Line at Station 30 plus 68.0, on the North side of the Public Road from Cruz Bay to Caneel Bay, the line runs North 4 degrees 19 minutes West a distance 239.2 feet, more or less, along Parcel No. 13, to a bound post; thence turning and running North 63 degrees 46 minutes West a distance of 237.2 feet, more or less, along Parcel No. 13, to a bound post; thence turning and running North 24 degrees 00 minutes West a distance of Ca 84 feet, to the sea; thence turning and running in a general northeasterly direction a distance of Ca 5920 feet, along the sea, to the Southwesterly corner of Parcel No. 20 Estate Caneel Bay, thence turning and running South 87 degrees 05 minutes East a distance of 40 feet, more or less, along Parcel No. 20, to a bound post; thence turning and running South 87 degrees 05 Minutes East a distance of 193.4 feet, more or less, along Parcel No. 20; thence turning and running South 83 degrees 03 minutes East a distance of 260.0 feet, more or less, to a bound post; thence turning and running in a general Southernly direction a distance of Ca2092 feet along the Right of Way to Hawknest Point, to the intersection of the right of way with the Public Road Right of Way from Caneel Bay to Trunk Bay; thence turning and running along the last mentioned right of way, in a general southernly direction a distance of Ca 1270 feet to a point on the right of way at Station 80 plus 69.0 feet of the Public Road from Cruz Bay to Caneel Bay; thence along this right of way to the point of beginning.

The above bounded tract contains 127.7 acres, more or less.

EXCEPTING AND RESERVING, however, from said Remainder of Estate Caneel Bay No. 8 Cruz Bay Quarter, Parcel No. "A", Estate Caneel Bay, 8 Cruz Bay Quarter, St. John, Virgin Islands, as delineated on Public Works Drawing No. G3-110-T64, comprising 2,456 square feet more or less, being the premises conveyed by Caneel Bay Plantation Inc. to Government of the Virgin Islands by Quitclaim Deed dated August 22, 1966, recorded July 5, 1967 in Book B-W, page 382, as Document No. 3262/1967, in exchange for which parcel the Government of the Virgin Islands quitclaimed an area of public road designated as Parcel "C" in PWD G3-110-T64, dated October 16, 1964, comprising an area of 1,300 square feet, more or less, by deed dated June 1, 1967, recorded July 5, 1967, in Book B-W, page 384, as Document No. 3261/1967. The said Parcel "C" is hereby included as a portion of the Premises.

All distances are in English Feet, and all bearings are related to the survey of Caneel Bay as shown on P.W. Drawing B-3-120 T-39, dated August 11, 1939, except the bearings along Parcel No. 20, which are related to the survey of Parcel 20.

Parcel No. 9 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 6.17 acres, more or less, as shown on P.W.D. D9-125-T56 dated November 11, 1956 and more particularly described as follows:

Beginning at a bound post on the north side of the Public Road from the Caneel Bay - Trunk Bay Road to the Center Line Road, the line runs in a general southeasterly direction a distance of Ca 710 feet, along the Public Road, to a bound post, the straight line bearing and distance between these points being South 26 degrees 54 minutes East a distance of 671.8 feet, more or less; thence turning and running in a general southernly and easternly direction a distance of Ca 855 feet, along the Public Road, to a bound post, the straight line bearing and distance between these points being South 42 degrees 35 minutes East a distance of 788.5 feet, more or less; thence turning and running North 26 degrees 38 minutes East a distance of 82.1 feet, more or less, along the Public Road, to a bound post; thence turning and running North 11 degrees 50 minutes East a distance of 300.0 feet, more or less, to a bound post; thence turning and running North 14 degrees 04 minutes West a distance of 229.5 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running South 25 degrees 13 minutes West a distance of 50.0 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 47 degrees 42 minutes West a distance of 370.4 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running by the following courses and distances; North 37 degrees 43 minutes West - 106.1 feet,more or less; North 4 degrees 45 minutes West, 175.4 feet, more or less; North 47 degrees 28 minutes West - 326.2 feet , more or less; North 58 degrees 31 minutes West - 158.3 feet, more or less; North 77 degrees 29 minutes West - 91.4 feet, more or less, along Parcel No. 8 to the point of boginning.

The above bounded Parcel contains 6.17 acres, more or less.

All distances are in English feet, and all bearings are related to the survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 10 of Estate Cancel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 0.584 acre more or less as shown on P.W.D. F9-119-T56 dated November 15, 1956 and more particularly described as follows:

Beginning at a bound post at the intersection of the Public Roads, from Cruz Bay to Trunk Bay and the Road from this Road to the Public Road, the line runs South 13 degrees 42 minutes West a distance of 143.5 feet, more or less, along the Public Road to a bound post; thence turning and running South 14 degrees 25 minutes East a distance of 33.3 feet, more or less, along the Public Road, to a bound post; thence turning and running South 46 degrees 53 minutes East a distance of 103.7 feet, more or less, along the Public Road, to a bound post opposite to Station 80 plus 69.0 on the relocation of the Public Road from Cruz Bay to Caneel Bay, thence turning and running South 38 degrees 55 minutes East a distance

of 50.0 feet, more or less, along the Public Road, to a bound post; thence turning and running North 64 degrees 59 minutes East a distance of 14.9 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 4 degrees 28 minutes East a distance of 191.4 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 52 degrees 33 minutes West a distance of 139.4 feet, more or less, along the Public Road to the Center Line Road, to the point of beginning.

The above bounded tract contains 0.584 acres, more or less.

All distances are in English feet, and all bearings are related to the Survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 11 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V. I. containing 1.594 acres, more or less, as shown on P.W.D. D9-121-T56 dated November 15, 1956 and more particularly shown as follows:

Beginning at a bound post of the south side of the Public Road from Cruz Bay to Caneel Bay and opposite Station 70 plus 76.0, the line runs South 55 degrees 08 minutes East a distance of 322.9 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running South 71 degrees 58 minutes East a distance of 214.0 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 58 degrees 44 minutes East a distance of 67.7 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 30 degrees 18 minutes West a distance of 260.2 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 54 degrees 44 minutes West a distance of 99.9 feet, more or less, to a bound post opposite to Station 74 plus 02.0 on the Center Line of the Public Road from Cruz Bay to Caneel Bay; thence along the Right of Way in a general Westerly direction to the point of beginning.

The above bounded tract contains 1.594 acre, more or less.

All distances are in English feet, and all bearings are related to the Survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 20 of Estate Caneel Bay (formerly Parcel No. 8) No. 8 Cruz Bay Quarter, St. John, V. I. containing 9.3 acres, more or less, as shown on P.W.D. D9-25-T51 dated April 2, 1951, and more particularly described as follows:

Parcel No. 20, formerly Parcel No. 8 consisting of two lots separated by a 25-ft. right of way, one bounded by a line starting at a tree growing on the rocks at the Northend of the beach and following a fence running South 40 degrees 18 minutes West for a distance of 64.8 feet, more or less; thence South 19 degrees 34 minutes West for a distance of

58.3 feet, more or less; thence South 13 degrees 11 minutes West for a distance of 61.1 feet, more or less, to a concrete bound post; thence North 83 degrees 03 minutes West for a distance of 159.2 feet, more or less, to a concrete bound post; thence North 3 degrees 09 minutes West for a distance of 256.2 feet, more or less, to a concrete bound post; thence on a curve to the right of 95-ft. radius for a distance of 69.5 feet, more or less, to a concrete bound post; thence North 38 degrees 40 minutes East for a distance of 57.6 feet, more or less, to a concrete bound post and thence South 40 degrees 59 minutes East for a distance of 291.3 feet, more or less, to the point of beginning.
The second lot is bounded by a line starting at a concrete bound post, a distance of 25.4 feet, North 83 degrees 03 minutes West from the second bound post mentioned in the preceding paragraph and runs North 83 degrees 03 minutes West for a distance of 260.0 feet, more or less, to a concrete bound post; thence North 87 degrees 05 minutes West for a distance of 193.4 feet, more or less, to a concrete bound post and through that bound post in the same direction for a distance of approximately 40 feet to the water's edge; thence following the water's edge in a northerly and then in a southeasterly direction for a distance of approximately 860 feet, and thence southwesterly for a distance of approximately 25 feet to a concrete bound post at the top of the bank;

thence South 41 degrees 50 minutes East for a distance of 76.4 feet, more or less, to a concrete bound post; thence following approximately the shoreward edge of a line of sea grape trees, North 76 degrees 24 minutes East for a distance of 173.3 feet, more or less, and then North 57 degrees 55 minutes East for a distance of 199.5 feet, more or less, to a concrete bound post; thence South 70 degrees 11 minutes East for a distance of 144.6 feet, more or less, to a concrete bound post; thence South 40 degrees 59 minutes East for a distance of 230.7 feet, more or less, to a concrete bound post; thence South 38 degrees 40 minutes West for a distance of 60.8 feet, to a concrete bound post; thence on a curve to the left of 120-ft. radius a distance of 82.7 feet, more or less, to a concrete bound post and thence South 3 degrees 09 minutes East for a distance of 252.2 feet, more or less, to the point of beginning.

The whole parcel contains an area of 9.3 acres, more or less.

Parcel No. 21 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I., containing 0.85 acres, more or less, as shown on P.W.D. G9-44-T51 dated June 27, 1951, revised September 30, 1951 and more particularly described as follows:

Beginning at the bound post at the Northwestern corner of Parcel No. 22, Estate Caneel Bay the line runs in a general Northerly direction a distance of 356 feet, more or less, along an access road to a bound post; thence turning and running South 83 degrees 05 minutes East a distance of 152 feet, more or less, along a 15 foot freeway to a boundpost; thence turning and running in a general Southerly direction .....

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.05
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a distance of 280 feet more or less, along a line 20 feet above high water mark to a concrete post; thence turning and running South 70 degrees 40 minutes West a distance of 143.5 feet, more or less, along Parcel 22 Caneel Bay to the point of beginning.

The above bounded tract contains 0.85 acres, more or less.

All distances are in English feet as determined by the stadia method and all bearings are related to the magnetic meridian.

Parcel No. 22 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I., containing 1.42 acres more or less, as shown on P.W.D. GP-45-T51 dated June 27, 1951 and more particularly described as follows:

Beginning at the boundpost at the Southeast corner of Parcel No. 21 of Estate Caneel Bay, the line runs in a general Southeasterly direction along the brush line, a distance of 205 feet, more or less, to a concrete boundpost, thence turning and running South 54 degrees 45 minutes West a distance of 273 feet, more or less, to a boundpost; thence turning and running North 36 degrees 20 minutes West a distance of 157 feet, more or less, along parcel No. 23 to a boundpost; thence turning and running in a general Northeasterly direction along the access Road a distance of 195 feet, more or less, to a boundpost;

thence turning and running North 70 degrees 40 minutes East a distance of 143.5 feet, more or less, along Parcel No. 21 to the point of beginning.

The above bounded tract contains 1.42 acres, more or less.

All distances are in English feet as determined by the Stadia method and all bearings are related to the magnetic meridian.

SCHEDULE B

Land situated in the Island of St. John, U. S. Virgin Islands, described as Parcel No. 52A Estate Caneel Bay, No. 2 Cruz Bay Quarter, as shown on P.W.D. D9-289-T61 dated December 6, 1961 and more particularly described as follows:

Beginning at a bound post situated south 77 degrees 13 minutes east, a distance of 188.0 feet more or less from a bound post at the southwest corner of Lot No. 52, the line runs north 12 degrees 52 minutes east, a distance of 185.4 feet more or less to a bound post; thence continuing in the same direction a distance of 2.1 feet more or less to a point; thence turning and running south 76 degrees 37 minutes east, a distance of 235.3 feet more or less to a bound post; thence turning and running south 12 degrees 30 minutes 30 seconds west, a distance of 185.1 feet more or less to a bound post; thence turning and running north 77 degrees 13 minutes west, a distance of 236.45 feet more or less to the point of beginning.

The above bounded tract contains 1.00 acres more or less.

United States Department of the Interior

OFFICE OF THE SOLICITOR
SOUTHEAST REGIONAL OFFICE
Richard B. Russell Federal Building
75 Spring Street, S.W.
Atlanta, Georgia 30303

IN REPLY REFER TO:

NPS.SE.0220
86-10-3347
KRF:bfh
LA-10

January 13, 1987

MEMORANDUM

TO: Thomas W. Piehl, Chief, Land Resources Division, NPS, Southeast Region

FROM: Roger Sumner Babb, Regional Solicitor, Southeast Region

SUBJECT: Final Title Opinion

File No.: Tract No.: 01-106, 01-107, 01-109, 01-111, 01-112, 01-113 and 01-114

Project: Virgin Islands National Park
Island of St. John U.S. Virgin Islands
Acreage: 148.618 Consideration: Donation
Estate Acquired: Fee Simple
Vendors: Jackson Hole Preserve, Incorporated

Deed Dated: 9/30/83 Filed: 10/4/83
Recorded in Book: 24Z Page: 359
Title Evidence No.: 55 009 05 00027 and
55 0007 05 000001 (TR. 01-111)
Prepared by: Chicago Title Insurance Company

An examination has been made of the title evidence and the related papers pertaining to certain land and interests therein which have been acquired under the authority of existing legislation. The land and estate acquired by the United States of America are more particularly described in the attached deed.

The attached final title evidence and accompanying data disclose valid title to be vested in the United States of America, subject to existing easements for public roads and highways, rights of way for railroads, pipelines and public utilities, the rights and easements noted in Schedule B of the attached title evidence and any reservations contained in the deed and option, which rights,

easements and reservations, if any, are in compliance with existing statutes and are such as the agency has advised will not interfere with the proposed use of the land.

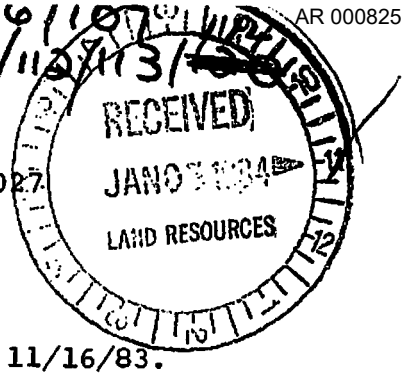
Sincerely yours,

Kathleen R. Fallon

For: Roger Sumner Babb
Regional Solicitor

Enclosures

ENDORSEMENT [redacted] 11/12/13



Attached to and forming a part of

U.S. ALTA Owners Policy No. 55 009 05 00027

Issued by

CHICAGO TITLE INSURANCE COMPANY

1. The effective date of this policy is amended to be 11/16/83.

2. The amount of insurance is amended to be $1,000,000.00

3. Schedule A Item 1 is amended to read: Fee simple, but subject to a "Retained Use Estate" stated to be for a period of forty years, as set forth within the indenture by which the insured aquired title.

4. Schedule A Item 2 is amended to read: The United States of America

5. Schedule B Items 5&6 are amended to read: (Effects "Retained Use Estate" only) Modification of First and Second Mortgages and notes among Jackson Hole Preserve, Inc., Caneel Bay, Inc., and Connecticut General Life Insurance Company, recorded 10/4/83 at Book 24-Z, Page 315 as Document No. 3404.

6. Schedule B Item 7 is amended to read: A "Retained Use Estate" in favor of Grantor stated to be for a period of forty years, as set forth in an indenture dated 9/30/83 from the Jackson Hole Preserve, Inc. in favor of the insured, recorded 10/4/83 at Book 24-Z, Page 359 as Document No. 3402. This policy insures title to the land, including the landscaping, walkways, roads, road systems, and automobile parking areas situated and on, but does not cover other improvements as more specifically excepted in the aforesaid Deed.

7. Schedule B Item 8 is amended to read: Real property taxes for the years 1979 through 1982. This policy insures the insured herein against loss or damage, including attorney's fees and costs of defense,

This endorsement is made a part of the commitment or policy. It is subject to all the terms of the commitment or policy and prior endorsements. Except as shown on this endorsement, the terms, dates and amount of the commitment or policy and prior endorsements are not changed.

CHICAGO TITLE INSURANCE COMPANY

Authorized Signatory

ATTEST: Richard P. Dorff President.

Robert E. Ellis Secretary.

Note: This endorsement shall not be valid or binding until countersigned by an authorized signatory.

Form 3594 R 7/80

SCHEDULE B

Policy Number 55 009 05 00027
Owners

This policy does not insure against loss or damage by reason of the following exceptions:

GENERAL EXCEPTIONS

Governmental Powers 1. Because of limitations imposed by law on ownership and use of property, or which arise from governmental powers, this policy does not insure against: (a) consequences of the future exercise or enforcement or attempted exercise or enforcement of police power, bankruptcy power, or power of eminent domain, under any existing or future law or governmental regulation; (b) consequences of any law, ordinance or governmental regulation, now or hereafter in force (including building and zoning ordinances), limiting or regulating the use or enjoyment of the property, estate or interest described in Schedule A, or the character, size, use or location of any improvement now or hereafter erected on said property.

Matters Not of Record 2. The following matters which are not of record at the date of this policy are not insured against: (a) rights or claims of parties in possession not shown of record; (b) questions of survey; (c) easements, claims of easement or mechanics' liens where no notice thereof appears of record; and (d) conveyances, agreements, defects, liens or encumbrances, if any, where no notice thereof appears of record; provided, however, the provisions of this subparagraph 2(d) shall not apply if title to said estate or interest is vested in the United States of America on the date hereof.

Matters Subsequent to Date of Policy 3. This policy does not insure against loss or damage by reason of defects, liens or encumbrances created subsequent to the date hereof.

Refusal to Purchase 4. This policy does not insure against loss or damage by reason of the refusal of any person to purchase, lease or lend money on the property, estate or interest described in Schedule A.

SPECIAL EXCEPTIONS

5. Mortgage dated 10/13/67 from Caneel Bay Plantation, Inc. to Connecticut General Life Insurance Co., recorded 12/21/67, Book 9-F, Page 370, Doc. No. 5070.

6. Mortgage dated 3/24/69 from Caneel Bay Plantation, Inc. to Connecticut General Life Insurance Co., recorded 4/9/69, Book 10-N, Page 76, Doc. No. 6252.

7. The premises insured are possibly subject to those certain conditions, reservations, and rights reserved to Jackson Hole Preserve Incorporated, and to the United States of America, as more specifically set forth in the Indenture from Jackson Hole Preserve Incorporated to the United States of America, by which the herein described premises will be conveyed and the date of which Indenture is not now available for insertion herein.

8. Real Property Taxes for the years 1979, 1980 and 1981, for all of the herein described properties, together with interest and penalties.

JACKSON HOLE PRESERVE,
INCORPORATED

to

UNITED STATES OF AMERICA

3402
1983

INDENTURE

THIS INDENTURE, made as of September 30, 1983 between JACKSON HOLE PRESERVE, INCORPORATED, a not-for-profit corporation organized and existing under the laws of the State of New York and having its principal office at 30 Rockefeller Plaza, New York, New York ("Grantor"), and the UNITED STATES OF AMERICA, acting by the Secretary of the Interior through the Director of the National Park Service ("Grantee");

WITNESSETH: That for and in consideration of One ($1.00) Dollar and other good and valuable consideration, paid by Grantee to Grantor, the receipt and sufficiency of which is hereby acknowledged;

GRANTOR HEREBY GRANTS, SELLS, RELEASES, AND QUIT-CLAIMS to Grantee all of Grantor's right, title, and interest in and to the following premises (collectively the "Premises"):

(A) the land, including the landscaping, walkways, roads, road systems, and automobile parking areas situated thereon, described in Schedule A annexed hereto and made a part hereof, being a part of the premises conveyed by Caneel Bay, Inc. to Grantor by Deed dated December 29, 1977 and recorded January 24, 1978 as Document No. 158 in Volume 18-0 Page 121 in the Office of the Recorder of Deeds for the District of St. Thomas and St. John, Virgin Islands of the United States ("Prior Deed"), but exclusive of all other improvements thereon as excepted and reserved by Caneel Bay, Inc. in the Prior Deed (the "Improvements"); and

(B) the land constituting Parcel No. 52A Estate Caneel Bay Number 2, Cruz Bay Quarter, St. John, Virgin Islands, described in Schedule B annexed hereto and made a part thereof, being the premises conveyed by Gustov Stark and Charlotte Dean Stark to Grantor by deed dated January 31, 1962 and recorded February 5, 1962 as document number 236 in the office of the Recorder of Deeds for the District of St. Thomas and St. John, Virgin Islands of the United States, but exclusive of all improvements thereon;

TOGETHER WITH all right, title, and interest of Grantor in and to all rights, easements, privileges, rights-of-way, and appurtenances belonging or pertaining to the Premises or used in connection therewith or for the benefit thereof;

RESERVING, however, unto Grantor the exclusive right to use and occupy the Premises (the "Retained Use Estate") upon the following terms and conditions:

1. Term of Retained Use Estate. Subject to the right of Grantor to terminate the Retained Use Estate pursuant to paragraph number 8 below, the Retained Use Estate shall continue for a term of forty (40) years from the date hereof.

2. Maintenance of Premises by Grantor Prior to Termination of Retained Use Estate. It is Grantor's expectation and intention that at some future time, to be determined by Grantor pursuant to the provisions set forth herein, the Retained Use Estate will be terminated and extinguished in order to carry out the longstanding objective of Grantor that the Premises ultimately be an integral part of the Virgin Islands National Park (the "Park") under the jurisdiction of the Secretary for the use and enjoyment by visitors to the Park of the outstanding scenic and other features of national significance located both within the Premises and in other areas of the Park. In keeping with this objective, Grantor agrees that, at all times prior to the termination of the Retained Use Estate pursuant to paragraph numbered 8 below Grantor will use and maintain the Premises in such a manner that will (a) be consistent with the preservation of such outstanding scenic and other features of national significance and (b) preserve the Premises to the extent feasible in their natural condition for the public benefit, enjoyment and inspiration, subject, however, to the right of Grantor to operate guest facilities for the accommodation of visitors to the Park on the Premises as provided for in paragraph numbered 3 below.

3. Grantor's Right to Operate or Provide for the Operation of Guest Facilities on the Premises. Consistent with its obligation with respect to the maintenance of the Premises set forth in paragraph numbered 2 above, Grantor intends, and shall have the right prior to any termination of the Retained Use Estate pursuant to paragraph numbered 8 below, to operate on the Premises guest facilities for the accommodation of visitors to the Park (including, without limitation, facilities for lodging and meals and other facilities and services of such types as may be appropriate for the accommodation of such visitors) and may conduct such related activities as Grantor deems advisable for the benefit of guests at such facilities. The operation of such guest facilities and conduct of such related activities may be carried on by Grantor either directly or through any subsidiary or indirectly through any other person selected by Grantor and in each case in such manner as Grantor deems necessary or advisable, without authoritative control or oversight by the Secretary, and prior to the termination of the Retained Use Estate pursuant to paragraph numbered 8 below Grantee shall have no responsibility with respect to the protection of visitors to the premises. Prior to any termination of the Retained Use Estate Grantor shall have sole discretion as to (a) the rates to be charged for the use of such facilities (including the rates for lodging, meals, and other facilities and services), (b) the location of such facilities and the nature, design, and construction thereof, (c) the determination of the persons to whom and the times at which such facilities are made available (provided, however, that the facilities shall be made avail-

able at all such times to all persons without discrimination or segregation on the ground of race, color, religion or national origin, in compliance with Section 201 of the Civil Rights Act of 1964), and (d) the addition to or removal or replacement of any facilities.

4. Grantor's Right to Add to and Alter Improvements. Grantor shall have the right to make, at its sole cost and expense and at any time, such additions, changes, renovations, and alterations, whether structural or otherwise, in or to the Premises and any improvements from time to time located on the Premises (including the Improvements) as Grantor shall, in its sole discretion, deem necessary or advisable.

5. Insurance to be Provided by Grantor. At all times prior to any termination of the Retained Use Estate pursuant to paragraph numbered 8 below Grantor, for the benefit of Grantor and Grantee, shall cause a policy or policies of public liability insurance to be maintained in respect of the Premises having limits of coverage which shall be not less than those maintained by or for the benefit of owners of real property in the United States Virgin Islands comparable in size and use to the Premises and such improvements. Grantor shall use its best efforts to cause Grantee to be named as a third party beneficiary as its interest may appear in each policy of public liability insurance so maintained.

6. Grantor's Right to Assign and Transfer, and to Mortgage, Retained Use Estate. Grantor may at any time without the approval of Grantee:

(i) assign and transfer the Retained Use Estate to any person (whether an individual, a corporation, or any other form of business entity); provided however, that any person to whom the Retained Use Estate may be assigned and transferred shall, simultaneously with such assignment and transfer, assume, by instrument in form and substance reasonably satisfactory to the Secretary, all of the obligations of Grantor set forth (a) in the second sentence of paragraph numbered 2 and in paragraph numbered 5 above and (b) if, simultaneously with such assignment and transfer by Grantor to such person of the Retained Use Estate, Grantor shall convey and transfer to such person all of its fee title in and to the improvements then located on the Premises (including the Improvements) title to which has not prior thereto been conveyed and transferred to Grantee, such person shall, by similar instrument, assume the obligations of Grantor in the second sentence of paragraph numbered 8, and upon such an assignment, transfer and assumption Grantor shall be relieved of all obligations hereunder; and

(ii) grant to any person (whether an individual, a corporation , or any other form of business entity) a mortgage or mortgages upon the Retained Use Estate and in connection therewith assign to the mortgagee(s) the Retained Use Estate. The mortgagee under any such mortgage shall not be personally liable for the obligations of Grantor hereunder unless and until the mortgagee becomes the owner of the Retained Use Estate and shall remain liable for such obligations only so long as it shall be the owner of the

Retained Use Estate. If Grantee is given the name and address of the mortgagee, Grantee shall give the mortgagee, by certified mail, a copy of any notice given by Grantee to Grantor of a default with respect to an obligation of Grantor hereunder. After receipt by the mortgagee of any such notice of default, the mortgagee shall be allowed such period of time as may be reasonably required to cure the default specified in such notice or to institute and complete proceedings for the foreclosure of such mortgage, and if the mortgagee is diligently proceeding to cure such default or to obtain possession of the Premises, neither Grantor nor Grantee shall terminate the Retained Use Estate. Upon a foreclosure of any such mortgage Grantee shall recognize the mortgagee or such other person or persons as may purchase the mortgagee's interest in the Retained Use Estate at a foreclosure sale as the owner of the Retained Use Estate. The mortgagee may be named as one of the insureds under fire and other hazard insurance policies maintained by Grantor with respect to the Premises and Improvements and any such mortgage may provide for the disposition of the proceeds under such insurance policies which may be otherwise payable directly to Grantor. So long as a mortgage of the Retained Use Estate is in effect, unless the mortgagee consents thereto, no provision herein relating to the Retained Use Estate shall be amended, the Retained Use Estate shall not be terminated, and fee title to the land and title to the Retained Use Estate shall not merge.

7. Appointment by Grantor of Operator of Guest Facilities. Grantor shall have the right at any time and from time to time to appoint any person (whether an individual, a corporation, or any other form of business entity) to operate the guest facilities now or hereafter located on the Premises for the accommodation of visitors to the Park and to oversee the management of the Premises and any improvements located thereon, and in such event the person so appointed shall enjoy all of the rights reserved to Grantor hereunder; provided, however, that in such event Grantor shall nevertheless remain liable for all of the obligations of the Grantor set forth herein. The Secretary, upon the acceptance of this Deed, hereby acknowledges that Caneel Bay, Inc., a U.S. Virgin Islands corporation having a principal office at Estate Caneel Bay, St. John, U.S. Virgin Islands, is on the date hereof the operator of the guest facilities now located at the Premises.

8. Termination by Grantor of Retained Use Estate. Grantor may, upon one (1) year's prior written notice mailed or delivered to the Secretary, terminate and extinguish the Retained Use Estate on a specified date (the "Termination Date"), provided, however, that the Termination Date shall not be prior to three (3) years from the date hereof. Such notice of termination shall include an offer by Grantor to convey and transfer to Grantee as of the Termination Date fee title in and to all improvements located on the Premises (including the Improvements) title to which has not previously been conveyed and transferred to Grantee, and shall be accompanied by the form of an instrument to effect such conveyance and transfer which Grantor will execute and deliver upon acceptance by Grantee of such offer. All mortgage liens on the Retained Use Estate and the Improvements must be satisfied or discharged prior to conveyance thereof

to Grantee. At any time after receipt of such notice of termination, but in no event later than one hundred eighty (180) days prior to the Termination Date, the Secretary shall mail or deliver to Grantor a written notice advising whether Grantee is willing to accept such conveyance and transfer. In the event that the Secretary (1) advises Grantor that Grantee is willing to accept such conveyance, and (2) determines, at any time within a period of one year following the termination of the Retained Use Estate by Grantor pursuant to this paragraph 8, that public accommodations, facilities, and services should continue to be made available to the public within the Park on the Premises by persons other than Grantee, the Secretary shall advise Grantor or its successors of such determination and shall provide a reasonable opportunity for Grantor, its subsidiaries, affiliates or successors to provide the same. For this purpose "reasonable opportunity" shall mean an opportunity, pursuant to the procedures then applicable, including competitive bidding, to provide the same in such form as is then generally utilized by Grantee to authorize public accommodations, facilities or services in areas operated as part of the national park system administered by Grantee.

TO HAVE AND TO HOLD the Premises in fee simple forever.

SUBJECT, HOWEVER, to existing covenants, easements, restrictions, and leases.

The Premises are conveyed upon the condition that if (A) the Premises or any part thereof shall at any time cease to be included within the Park or (B) in connection with a termination of the Retained Use Estate pursuant to paragraph numbered 8 above, Grantee shall have advised Grantor pursuant to the provisions of that paragraph that Grantee is not willing to accept a conveyance of fee title to the improvements located on the Premises (including the Improvements), then upon the occurrence of either such event (a) title to the Premises or such part thereof, as the case may be, shall revert, automatically and without further deed, to (i) Grantor or any successor to Grantor or (ii) if Grantor or such a successor shall not then exist, the National Park Foundation, a corporation incorporated under United States law, or any successor thereto or (iii) if said Foundation or such a successor shall not then exist, another organization selected by the Secretary which is exempt from United States income taxation and which is engaged primarily in the preservation and protection of land in its natural condition for the enjoyment of the general public (such corporation or other organization hereinafter referred to as the "Revertee"); and (b) Grantee shall execute and deliver to the Revertee an instrument, in form suitable for recordation and indexing in the appropriate recording system and in form and substance reasonably acceptable to the Revertee, referring to the aforesaid provision for automatic reversion of title and evidencing that one of the events described in the foregoing clauses (A) and (B) has occurred, and the Revertee shall have the right to reenter and repossess the Premises, or such part thereof, and shall have all rights of ownership with respect thereto.

This conveyance is by way of gift, without consideration except the nominal consideration hereinabove recited, and is made without warranty of any kind. This Indenture shall be effective as of September 30, 1983.

IN WITNESS WHEREOF, Grantor has caused these presents to be executed by its officers thereunto duly authorized and its corporate seal to be hereunto affixed as of the day and year first above written.

(CORPORATE SEAL)

JACKSON HOLE PRESERVE, INCORPORATED

Franklin E. Parker
Secretary

By: Laurance S. Rockefeller
President

Signed, sealed and delivered in the presence of:

State of New York)
: ss.:
County of New York)

On this 13th day of September, 1983 before me appeared Laurance S. Rockefeller to me personally known, who, being duly sworn, did say that he is the President of Jackson Hole Preserve, Incorporated, a corporation, and that the seal affixed to this instrument is the corporate seal of said corporation and that said instrument was signed and sealed on behalf of said corporation by authority of its Board of Trustees, and said President acknowledged said instrument to be the free act and deed of said corporation.

Given under my hand and notarial seal this 13th day of September, 1983.

(NOTARY SEAL)

Ruth C. Haupert
NOTARY PUBLIC
RUTH C. HAUPERT
Notary Public, State of New York
No. 41-4640601
Qualified in Queens County
Certificate Filed in New York County
Commission Expires March 30, 1985

NOTED IN THE PUBLIC SURVEYOR'S RECORD FOR COUNTRY PROPERTY, BOOK FOR ESTATE CANEEL BAY, NO. 8 CRUZ BAY QUARTER, ST. JOHN, VIRGIN ISLANDS.

OFFICE OF PUBLIC SURVEYOR
ST. THOMAS, V.I. Oct. 4, 1983.
Louis M. Harrigan
PUBLIC SURVEYOR

RECORDED AND INDEXED IN THE RECORDER'S OFFICE FOR THE DISTRICT OF ST. THOMAS AND ST. JOHN, VIRGIN ISLANDS OF THE U.S.A.
BOOK REAL (PERSONAL) PROPERTY REGISTER FOR SUB NO. 3402 AND ENTERED IN Cruz Bay QUARTER NO. 339
PAGE 3, 184 - 330 + 304
DATED October 4 19 83
Marie T. Bean
DISTRICT RECORDER OF DEEDS
Fee 364

'83 OCT 4 AM 11 28
RECORDER OF DEEDS

UNITED STATES
DEPARTMENT OF THE INTERIOR
WASHINGTON

The within Indenture is hereby agreed to and accepted on behalf of the United States of America, Department of the Interior, National Park Service, by the Director, Russell E. Dickenson, under the authority contained in the Act approved August 2, 1956 (70 Stat. 940) and pursuant to the Authority delegated in the Department Manual, Part 245 DM 1.1 A.

Dated: Sept. 22, 1983

Russell E. Dickenson

Russell E. Dickenson, Director,
National Park
Service

SCHEDULE A

Land situated in the Island of St. John, U.S. Virgin Islands, described as

Remainder of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 127.7 acres, more or less, as shown on P.W.D. F9-122-T56 dated November 15, 1956, and more particularly described as follows:

Beginning at the Bound Post of the Right of Way Line at Station 30 plus 68.0, on the North side of the Public Road from Cruz Bay to Caneel Bay, the line runs North 4 degrees 19 minutes West a distance 239.2 feet, more or less, along Parcel No. 13, to a bound post; thence turning and running North 63 degrees 46 minutes West a distance of 237.2 feet, more or less, along Parcel No. 13, to a bound post; thence turning and running North 24 degrees 00 minutes West a distance of Ca 84 feet, to the sea; thence turning and running in a general northeasterly direction a distance of Ca 5920 feet, along the sea, to the Southwesterly corner of Parcel No. 20 Estate Caneel Bay, thence turning and running South 87 degrees 05 minutes East a distance of 40 feet, more or less, along Parcel No. 20, to a bound post; thence turning and running South 87 degrees 05 Minutes East a distance of 193.4 feet, more or less, along Parcel No. 20; thence turning and running South 83 degrees 03 minutes East a distance of 260.0 feet, more or less, to a bound post; thence turning and running in a general Southernly direction a distance of Ca2092 feet along the Right of Way to Hawknest Point, to the intersection of the right of way with the Public Road Right of Way from Caneel Bay to Trunk Bay; thence turning and running along the last mentioned right of way, in a general southernly direction a distance of Ca 1270 feet to a point on the right of way at Station 80 plus 69.0 feet of the Public Road from Cruz Bay to Caneel Bay; thence along this right of way to the point of beginning.

The above bounded tract contains 127.7 acres, more or less.

EXCEPTING AND RESERVING, however, from said Remainder of Estate Caneel Bay No. 8 Cruz Bay Quarter, Parcel No. "A", Estate Caneel Bay, 8 Cruz Bay Quarter, St. John, Virgin Islands, as delineated on Public Works Drawing No. G3-110-T64, comprising 2,456 square feet more or less, being the premises conveyed by Caneel Bay Plantation Inc. to Government of the Virgin Islands by Quitclaim Deed dated August 22, 1966, recorded July 5, 1967 in Book B-W, page 382, as Document No. 3262/1967, in exchange for which parcel the Government of the Virgin Islands quitclaimed an area of public road designated as Parcel "C" in PWD G3-110-T64, dated October 16, 1964, comprising an area of 1,300 square feet, more or less, by deed dated June 1, 1967, recorded July 5, 1967, in Book B-W, page 384, as Document No. 3261/1967. The said Parcel "C" is hereby included as a portion of the Premises.

All distances are in English Feet, and all bearings are related to the survey of Caneel Bay as shown on P.W. Drawing B-3-120 T-39, dated August 11, 1939, except the bearings along Parcel No. 20, which are related to the survey of Parcel 20.

Parcel No. 9 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 6.17 acres, more or less, as shown on P.W.D. D9-125-T56 dated November 11, 1956 and more particularly described as follows:

Beginning at a bound post on the north side of the Public Road from the Caneel Bay - Trunk Bay Road to the Center Line Road, the line runs in a general southeasterly direction a distance of Ca 710 feet, along the Public Road, to a bound post, the straight line bearing and distance between these points being South 26 degrees 54 minutes East a distance of 671.8 feet, more or less; thence turning and running in a general southernly and easternly direction a distance of Ca 855 feet, along the Public Road, to a bound post, the straight line bearing and distance between these points being South 42 degrees 35 minutes East a distance of 788.5 feet, more or less; thence turning and running North 26 degrees 38 minutes East a distance of 82.1 feet, more or less, along the Public Road, to a bound post; thence turning and running North 11 degrees 50 minutes East a distance of 100.0 feet, more or less, to a bound post; thence turning and running North 14 degrees 04 minutes West a distance of 229.5 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running South 25 degrees 13 minutes West a distance of 50.0 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 47 degrees 42 minutes West a distance of 370.4 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running by the following courses and distances; North 37 degrees 40 minutes West - 106.1 feet, more or less; North 4 degrees 45 minutes West, 175.4 feet, more or less; North 47 degrees 28 minutes West - 326.2 feet., more or less; North 58 degrees 31 minutes West - 158.3 feet, more or less; North 77 degrees 29 minutes West - 91.4 feet, more or less, along Parcel No. 8 to the point of beginning.

The above bounded Parcel contains 6.17 acres, more or less.

All distances are in English feet, and all bearings are related to the survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 10 of Estate Cancel Bay, No. 8 Cruz Bay Quarter, St. John, V.I. containing 0.584 acre more or less as shown on P.W.D. F9-119-T56 dated November 15, 1956 and more particularly described as follows:

Beginning at a bound post at the intersection of the Public Roads, from Cruz Bay to Trunk Bay and the Road from this Road to the Public Road, the line runs South 13 degrees 42 minutes West a distance of 143.5 feet, more or less, along the Public Road to a bound post; thence turning and running South 14 degrees 25 minutes East a distance of 33.3 feet, more or less, along the Public Road, to a bound post; thence turning and running South 46 degrees 53 minutes East a distance of 103.7 feet, more or less, along the Public Road, to a bound post opposite to Station 80 plus 69.0 on the relocation of the Public Road from Cruz Bay to Caneel Bay, thence turning and running South 38 degrees 55 minutes East a distance

of 50.0 feet, more or less, along the Public Road, to a bound post; thence turning and running North 64 degrees 59 minutes East a distance of 14.9 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 4 degrees 28 minutes East a distance of 191.4 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 52 degrees 33 minutes West a distance of 139.4 feet, more or less, along the Public Road to the Center Line Road, to the point of beginning.

The above bounded tract contains 0.584 acres, more or less.

All distances are in English feet, and all bearings are related to the Survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 11 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V. I. containing 1.594 acres, more or less, as shown on P.W.D. P9-121-T56 dated November 15, 1956 and more particularly shown as follows:

Beginning at a bound post of the south side of the Public Road from Cruz Bay to Caneel Bay and opposite Station 70 plus 76.0, the line runs South 55 degrees 08 minutes East a distance of 322.9 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running South 71 degrees 58 minutes East a distance of 214.0 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 58 degrees 44 minutes East a distance of 67.7 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 30 degrees 18 minutes West a distance of 260.2 feet, more or less, along Parcel No. 8, to a bound post; thence turning and running North 54 degrees 44 minutes West a distance of 99.9 feet, more or less, to a bound post opposite to Station 74 plus 02.0 on the Center Line of the Public Road from Cruz Bay to Caneel Bay; thence along the Right of Way in a general Westerly direction to the point of beginning.

The above bounded tract contains 1.594 acre, more or less.

All distances are in English feet, and all bearings are related to the Survey of Parcel No. 20 Estate Caneel Bay.

Parcel No. 20 of Estate Caneel Bay (formerly Parcel No. 8) No. 8 Cruz Bay Quarter, St. John, V. I. containing 9.3 acres, more or less, as shown on P.W.D. D9-25-T51 dated April 2, 1951, and more particularly described as follows:

Parcel No. 20, formerly Parcel No. 8 consisting of two lots separated by a 25-ft. right of way, one bounded by a line starting at a tree growing on the rocks at the Northend of the beach and following a fence running South 40 degrees 18 minutes West for a distance of 64.8 feet, more or less; thence South 19 degrees 34 minutes West for a distance of

58.3 feet, more or less; thence South 13 degrees 11 minutes West for a distance of 61.1 feet, more or less, to a concrete bound post; thence North 83 degrees 03 minutes West for a distance of 159.2 feet, more or less, to a concrete bound post; thence North 3 degrees 09 minutes West for a distance of 256.2 feet, more or less, to a concrete bound post; thence on a curve to the right of 95-ft. radius for a distance of 69.5 feet, more or less, to a concrete bound post; thence North 38 degrees 40 minutes East for a distance of 57.6 feet, more or less, to a concrete bound post and thence South 40 degrees 59 minutes East for a distance of 291.3 feet, more or less, to the point of beginning.
The second lot is bounded by a line starting at a concrete bound post, a distance of 25.4 feet, North 83 degrees 03 minutes West from the second bound post mentioned in the preceding paragraph and runs North 83 degrees 03 minutes West for a distance of 260.0 feet, more or less, to a concrete bound post; thence North 87 degrees 05 minutes West for a distance of 193.4 feet, more or less, to a concrete bound post and through that bound post in the same direction for a distance of approximately 40 feet to the water's edge; thence following the water's edge in a northerly and then in a southeasterly direction for a distance of approximately 860 feet, and thence southwesterly for a distance of approximately 25 feet to a concrete bound post at the top of the bank;

thence South 41 degrees 50 minutes East for a distance of 76.4 feet, more or less, to a concrete bound post; thence following approximately the shoreward edge of a line of sea grape trees, North 76 degrees 24 minutes East for a distance of 173.3 feet, more or less, and then North 57 degrees 55 minutes East for a distance of 199.5 feet, more or less, to a concrete bound post; thence South 70 degrees 11 minutes East for a distance of 144.6 feet, more or less, to a concrete bound post; thence South 40 degrees 59 minutes East for a distance of 230.7 feet, more or less, to a concrete bound post; thence South 38 degrees 40 minutes West for a distance of 60.8 feet, to a concrete bound post; thence on a curve to the left of 120-ft. radius a distance of 82.7 feet, more or less, to a concrete bound post and thence South 3 degrees 09 minutes East for a distance of 252.2 feet, more or less, to the point of beginning.

The whole parcel contains an area of 9.3 acres, more or less.

Parcel No. 21 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I., containing 0.85 acres, more or less, as shown on P.W.D. G9-44-T51 dated June 27, 1951, revised September 30, 1951 and more particularly described as follows:

Beginning at the bound post at the Northwestern corner of Parcel No. 22, Estate Caneel Bay the line runs in a general Northerly direction a distance of 356 feet, more or less, along an access road to a bound post; thence turning and running South 83 degrees 05 minutes East a distance of 152 feet, more or less, along a 15 foot roadway to a boundpost; thence turning and running in a general Southerly direction .....

a distance of 280 feet more or less, along a line 20 feet above high water mark to a concrete post; thence turning and running South 70 degrees 40 minutes West a distance of 143.5 feet, more or less, along Parcel 22 Caneel Bay to the point of beginning.

The above bounded tract contains 0.85 acres, more or less.

All distances are in English feet as determined by the stadia method and all bearings are related to the magnetic meridian.

Parcel No. 22 of Estate Caneel Bay, No. 8 Cruz Bay Quarter, St. John, V.I., containing 1.42 acres more or less, as shown on P.W.D. G.-45-T51 dated June 27, 1951 and more particularly described as follows:

Beginning at the boundpost at the Southeast corner of Parcel No. 21 of Estate Caneel Bay, the line runs in a general Southeasterly direction along the brush line, a distance of 205 feet, more or less, to a concrete boundpost, thence turning and running South 54 degrees 45 minutes West a distance of 273 feet, more or less, to a boundpost; thence turning and running North 36 degrees 20 minutes West a distance of 157 feet, more or less, along parcel No. 23 to a boundpost; thence turning and running in a general Northeasterly direction along the access Road a distance of 195 feet, more or less, to a boundpost;

thence turning and running North 70 degrees 40 minutes East a distance of 143.5 feet, more or less, along Parcel No. 21 to the point of beginning.

The above bounded tract contains 1.42 acres, more or less.

All distances are in English feet as determined by the Stadia method and all bearings are related to the magnetic meridian.

SCHEDULE B

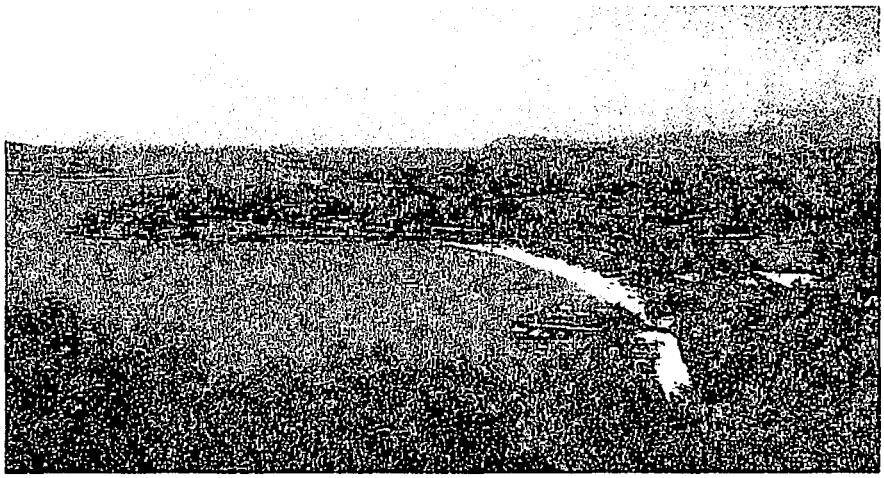
Land situated in the Island of St. John, U. S. Virgin Islands, described as Parcel No. 52A Estate Caneel Bay, No. 2 Cruz Bay Quarter, as shown on P.W.D. D9-289-T61 dated December 6, 1961 and more particularly described as follows:

Beginning at a bound post situated south 77 degrees 13 minutes east, a distance of 188.0 feet more or less from a bound post at the southwest corner of Lot No. 52, the line runs north 12 degrees 52 minutes east, a distance of 185.4 feet more or less to a bound post; thence continuing in the same direction a distance of 2.1 feet more or less to a point; thence turning and running south 76 degrees 37 minutes east, a distance of 235.3 feet more or less to a bound post; thence turning and running south 12 degrees 30 minutes 30 seconds west, a distance of 185.1 feet more or less to a bound post; thence turning and running north 77 degrees 13 minutes west, a distance of 236.45 feet more or less to the point of beginning.

The above bounded tract contains 1.00 acres more or less.

RECORDER OF DEEDS
'83 OCT 4 AM 11 28

U.S. Department of the Interior
NATIONAL PARK SERVICE
Virgin Islands National Park



Various Tracts
Caneel Bay Resort

Level I
Pre-Acquisition
Environmental Site Assessment
Survey

September 4, 2012

Prepared By:

Barksdale & Associates, Inc.
Professional Environmental Services
105 South G Street
Pensacola, Florida 32502

EXECUTIVE SUMMARY

The Caneel Bay Resort (CBR) property is located on the west part of the island of St. John, U.S. Virgin Islands, in the Virgin Islands National Park (VIIS). The property consists of nine land tracts totaling 150.32 acres. The property is located approximately 1 mile northeast of the town of Cruz Bay. The property consists of a large vacation resort with approximately 100 buildings and structures used for lodging, food services, recreation, docks, marinas and maintenance services. The resort property is adjacent to Caneel Bay, to the west, and also includes several beaches and large areas of undeveloped woods. The National Park Service (NPS) currently owns the land but proposes to acquire ownership of the buildings and structures. The subject land tracts and parcels are:

Tract Number	Parcel	Appx. Acreage	Current Land Use
01-109	Remainder	127.70	Main Resort Area
01-112	9	6.17	Main Resort Area
01-113	10	0.58	Main Resort Area
01-114	11	1.59	Main Resort Area
01-106	20	9.30	Main Resort Area
01-107	21 & 22	1.97	Main Resort Area
04-102	5	1.01	Executive Housing
04-104	12	1.69	Employee Housing
04-115	12D	0.31	Marina

A Level I Pre-Acquisition Environmental Site Assessment (ESA) Survey (Level I Survey) was completed for the property, and is documented in the NPS Level I Survey Checklist for Proposed Real Estate Acquisitions (Checklist) included as Attachment 3. The Level I Survey included a site inspection on May 22 and 23, 2012, preparation of the Checklist, and a review of government agency records and historical uses of the property.

No significant data gaps were identified during the performance of this Level I Survey. There are a number of recognized environmental conditions (RECs) identified in connection with the property. These RECs are associated with: the maintenance and engineering area; the landscaping and grounds maintenance area; the wastewater treatment plant; the emergency generator building; the emergency generator fuel tanks; the marina; the former fuel storage tanks for the marina; and the debris landfill. No historical RECs or environmental cleanup liens were identified in connection with the property. Based on the information obtained during this Level I Survey, there is evidence of a potential for contaminants of concern, or the effects of contaminants of concern, to be present on the property. A Level II Survey on the property is recommended. For the purpose of this Level I Survey, contaminants of concern would include Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances, pollutants or contaminants, petroleum products, and/or other controlled substances (e.g., Drug Enforcement Agency [DEA] substances).

The following Level II activities are recommended for the subject property:

- Additional efforts should be made to locate any environmental reports or studies that may have been produced for the above mentioned RECs or other areas on the subject tracts. These reports may provide additional information that would be helpful for the

subsequent Level II activities.

- A Level II work plan should be prepared which provides a detailed scope of work for Level II site investigation activities at each identified REC area. The Level II work plan should include soil, sediment, surface water and/or groundwater sampling, as appropriate for each REC area.
- The Level II work plan should be implemented to determine or confirm whether a significant release of hazardous substances or petroleum products to the environment has occurred at each REC area.

1.0 INTRODUCTION

The Caneel Bay Resort (CBR) property is located on the west part of the island of St. John, U.S. Virgin Islands, in the Virgin Islands National Park (VIIS). The property consists of nine land tracts totaling 150.32 acres. The property is located approximately 1 mile northeast of the town of Cruz Bay. The property consists of a large vacation resort with approximately 100 buildings and structures used for lodging, food services, recreation, docks, marinas and maintenance services. The resort property is adjacent to Caneel Bay, to the west, and also includes several beaches and large areas of undeveloped woods. The National Park Service (NPS) currently owns the land but proposes to acquire ownership of the buildings and structures. The subject land tracts and parcels are:

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01-114	11	1.59	Main Resort Area
01-106	20	9.30	Main Resort Area
01-107	21 & 22	1.97	Main Resort Area
04-102	5	1.01	Executive Housing
04-104	12	1.69	Employee Housing
04-115	12D	0.31	Marina

Site location maps are included as Attachment 1. Selected site photographs are included as Attachment 2.

2.0 SCOPE OF WORK

A Level I Pre-Acquisition Environmental Site Assessment (ESA) Survey (Level I Survey) was conducted for the subject property by Barksdale & Associates, Inc., (B & A) in general accordance with the American Society for Testing and Materials (ASTM) Method E 1527-05 and NPS Level I Survey guidance. The Level I Survey consisted of the following four components:

- A site reconnaissance (site inspection).
- A records search and review.
- Interviews.
- Report preparation.

The purpose of the Level I Survey was to identify, to the extent feasible, "recognizable environmental conditions" (RECs) in general accordance with 40 Code of Federal Regulations (CFR) Section 312.10 and the ASTM Method E 1527-05. As defined in ASTM E 1527-05, a REC is:

- "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property."

The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include "de minimus" conditions that generally do not present a material risk of harm to public health or to the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate government agencies.

The Level I Survey also identified any historical RECs. As defined in ASTM E 1527-05, a historical REC is:

- "an environmental condition which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently."

Sections A through C of the NPS Level I Survey Checklist for Proposed Real Estate Acquisitions (Checklist) were completed by B & A on the basis of observations during the site inspection and on information provided by individuals interviewed for the Level I Survey. A copy of the Checklist is included as Attachment 3.

3.0 SITE INSPECTION

A site inspection of the property was conducted on May 22 and 23, 2012, by John D. Barksdale, P.G., of B & A. The property was inspected by vehicle and on foot with no limitations to accessibility. B & A was escorted on the property by several members of the CBR security staff. On May 22, 2012, B & A was accompanied by Rafe Boulon, Chief of VIIS Resource Management. The adjacent properties were also observed.

The visual inspection of the property was conducted for all conditions outlined in the Checklist. As stated above, the property consists of 150.32 acres of resort, maintenance areas, beaches, undeveloped woods, a marina and employee housing areas. The CBR is reported to have been in operation since the 1950s. A number of plantation-era ruins and structures are also present on the main resort area and are incorporated into the resort attractions. The property is located in a general area that is primarily undeveloped woods, residential and recreational land.

No septic tanks or water supply wells were observed or are believed to be present on the property. Municipal electric and sewer service is believed to be present on the property. Drinking water for the resort area is supplied by the water treatment plant operated by the CBR. Electric, sewer and water service lines are underground.

The property has elevations ranging from sea level to approximately 40 feet above sea level. The soil beneath the property appears to be sandy rocky loam; some rock outcrops are present. The land surface of the subject property generally slopes downward from the center to the shorelines of Turtle Bay (to the north), Caneel Bay (to the west) and Hawksnest Bay (to the east). The local direction of shallow groundwater flow beneath the property would be expected to follow the topographic slope from the higher areas to the shorelines of these water bodies.

The following provides the results of the site inspection by tract number.

Tracts 01-106, 01-107, 01-109, 01-112, 01-113, and 01-114.

These tracts comprise the main resort property and include lodging buildings (including 161 guest rooms), restaurants, gift shops, beaches, a boat dock, tennis courts, open mowed grounds, and wooded areas. Maintenance and support areas include a laundry facility, grounds and landscaping maintenance, engineering and equipment repair areas, a wastewater treatment facility, a drinking water treatment plant, an ice plant, emergency generators, above ground fuel storage tanks, and dry goods storage buildings. The following areas of concern were observed on these tracts:

Engineering and Maintenance

- Approximately 20 buildings are located in the engineering and maintenance area, which is in the southeast part of the property. The area appears to be used for the repair and maintenance of buildings, vehicles, golf carts, and landscape maintenance equipment, and for charging vehicular batteries. Numerous open and closed containers of waste motor oil, and oil filters were present in this area. Automotive batteries were observed on the concrete floors; the floors were stained from battery leakage. Several areas of oil stains on the work tables, concrete floors and on the soil outside the buildings were observed in this area. Numerous storm water drains are present near buildings with oil stained floors. The storm water drains and the surface drainage in the area appear to flow east and north to a small drainage ditch north of the engineering area. The stained tables, floors and soil are considered to be a recognized environmental condition (REC).
- A flush-mounted monitoring well manhole was observed in the concrete pavement just south of the diving storage building. Alvin Nazario with the Caneel Bay Resort indicated that the well was put in to monitor underground fuel storage tanks (USTs) that were removed from that area in the 1990s; Mr. Nazario stated that no contamination was detected in the well. The former USTs and monitoring well are considered to be a REC.

Grounds and Landscaping

- Approximately six buildings are located in this area, which is just west of engineering. The area appears to be used for growing plants, landscape equipment repairs, and storage of lawn and garden chemicals and supplies. Several storage buildings were observed with bags and containers of various pesticides, herbicides and fertilizers; these materials were observed to have leaked or spilled onto the unpaved floors of the sheds. These leaked or spilled materials are considered to be a REC.
- An open-sided equipment maintenance building was observed to have numerous pieces of oily equipment, oil stained tables, oil-stained concrete floors, an open container of used motor oil, and numerous cans of gasoline and oil. An oily odor was present in this area. The oil-stained tables and floors are considered to be a REC.

Emergency Generator Building

- This building is west of engineering and houses two large diesel-powered emergency electric generators. A strong oily odor was present in the building. The concrete floor beneath the generators was oil stained. Several large lead-acid batteries were present on the floor of the building. Two shallow floor gutters in the building appear to discharge oil or other liquid leaks from the generators to the soil outside on the east side of the building; two areas of oil-stained soil were present on the ground beneath these two

discharge points. The oil-stained floors and soil are considered to be a REC.

Emergency Generator Fuel Tanks

- Three above ground storage tanks (ASTs) are present just north of the generator building. One AST is approximately 20,000 gallons in capacity and appears to hold diesel fuel for the emergency generators. One AST is approximately 10,000 gallons and appears to hold gasoline. One AST is approximately 500 gallons and appears to hold gasoline. A diesel and gasoline fuel dispenser was present in the area. A diesel fuel leak is reported to have occurred two years ago; the fuel-impacted soil is reported to have been excavated, covered with a tarp and placed on a concrete pad near the ASTs. A covered area of stockpiled soil (approximately 15' by 40') was observed in this area; however, the exact area from which the soil was excavated was not determined.
- An approximately 3' by 6' area of fuel-stained soil was observed near the 500-gallon gasoline AST beneath a 1.5" steel pipe that was dripping fuel. The fuel appeared to be diesel; however, the source of the leaking fuel was not determined.
- An approximately 5' by 12' area of distressed vegetation and fuel-stained soil was observed just east of the 10,000-gallon gasoline AST; the leaked fuel appeared to be gasoline. The depth of the fuel-impacted soil was more than 6 inches.
- The past and current fuel leaks and fuel-impacted soils in this area are considered to be RECs.

Wastewater Treatment Plant

- An approximately 5' diameter oil stain was observed on the concrete floor of a small pump building for the plant.
- An approximately 2' diameter oil stain was observed on the ground near the treatment plant buildings. The stain appeared to be oil that leaked from a vehicle or other equipment previously parked at that location.
- The oil-stained floor and soil are considered to be RECs.

Debris Landfill Near Honeymoon Beach

- This landfill is an open area near Honeymoon Beach in the southwest part of the resort area. The landfill is used to dispose of "organic" materials including wood scraps, trimmed vegetation and inert debris.
- The area is reported to have periodically received sludge from the CBR wastewater treatment plant. Even though the treated wastewater is believed to have been primarily sanitary sewage, it is possible that the sludge contained heavy metals or other chemical contaminants.
- The debris landfill is considered to be a REC.

Tract 04-115

This tract is a marina and fuel facility on the west facing shore of Caneel Bay, approximately 0.5 miles south of the main resort area. The marina facility is reported to have operated at this location since the 1960s. The marina is currently used for support of the resort vessels, which include three ferries and a smaller motor boat. The facility includes a large concrete mooring dock; fuel pumps on the dock; subsurface fuel pipes; above ground storage tanks (ASTs) for

gasoline, diesel and waste oil; and two buildings used for offices, repair parts storage, repair material storage (e.g., oil, lubricants, batteries, engine coolant, etc.), and for conducting boat equipment repairs. Captain Calvin Thomas with the Caneel Bay Resort has been at the facility for the last 20 years; Captain Thomas stated that no reportable spills have occurred from the ASTs or piping at the facility. The following areas of concern were observed on this tract:

- The grounds of the marina near the water were reported to have been formerly used for repairs and maintenance of dry-docked boats, including boat-bottom re-painting. Boat bottom paints are known to have contained heavy metals. Sanding of old bottom paints may have contaminated surface soils and bay sediment with metals. Pieces of fiberglass and polyurethane or epoxy resin were observed on the ground in this area. An oil-stained wooden pallet was also observed on the ground in this area.
- Oil-stained concrete floors and an oily odor were present in the west building near open and closed containers of waste oil. Approximately ten lead-acid batteries were observed to be stored on the concrete floor; the floor near the batteries was stained. Numerous containers of paints, oils and cleaners were present in the west building. Outboard motors, fuel cans, air compressors and electric generators were also present in the building.
- The past and current operation of the marina, the fueling station, the fuel and waste oil ASTs, the fuel pipeline and boat repair facility (since the 1960s) are considered to be a REC for this tract.

Tract 04-104

This tract is located just west of Tract 04-115 (the marina) and is used as housing for CBR employees. Two, two-story apartment buildings are present on the east part of the tract. The north part of the tract is the location of one or more former fuel ASTs which served the nearby marina facility. An underground pipeline is reported to have conveyed fuel from the ASTs to the marina. The following area of concern was observed on this tract:

- The former location of the fuel ASTs is an overgrown area with two concrete tank support structures. No direct evidence of fuel spills or releases was observed in this area. However, the past operation of the fuel ASTs and underground pipeline is considered to be a REC for this tract.

Tract 04-102

This tract is located just north of Tract 04-115 (the marina) and is used as housing for CBR executive staff. Three, one-story, single-family houses are present on the tract. No areas of concern were observed on this tract.

The adjacent properties were also observed during the site inspection. The land use of the adjacent properties is as follows:

- North – Turtle Bay and undeveloped wooded land.
- South – Undeveloped wooded land and Highway 20.
- East – Hawksnest Bay and undeveloped wooded land.
- West – Caneel Bay.

As stated above, a number of RECs were identified on the subject property during the site inspection conducted for this Level I survey. No RECs were identified on the adjacent properties.

4.0 RECORD SEARCHES

An electronic data search of federal, state and local government environmental records was conducted by Environmental Data Resources, Inc. (EDR). The result of the search is a "Zip" report listing all sites located in the same zip code as the subject property, rather than a map of the sites. All of St. John is covered by the same zip code (00830). The specific databases searched and sites found are listed in the EDR ZIP/PLUS™ Report, which is included as Attachment 4.

All sites listed in the Zip Report were also reviewed by Rafe Boulon (VIIS) to verify the locations with respect to the subject property. A number of the listed sites are in Cruz Bay and are within 0.5 miles of the subject property. However, all of the listed sites, except one, are separated hydrologically (i.e., are downgradient or across gradient) or topographically (i.e., are in separate watersheds) from the subject tracts One site, the Caneel Bay Hotel site, is believed to be located on the subject property at the main resort. The Caneel Bay Hotel site listing indicates that the facility is currently not a RCRA hazardous waste generator, and has no violations listed. However, in 1992 the facility was a RCRA large quantity hazardous waste generator with no violations noted. The Caneel Bay Hotel site is also listed as a Facility Index Site (FINDS) which lists the RCRA generator status and a surface water pollutant discharge permit (NPDES). The EDR report does not provide specific details about the Caneel Bay Hotel sites; however, the information confirms the industrial nature of several areas of the subject property. As a result of the type of sites, and the locations and distances to the subject property, it is unlikely that any of the sites listed in the Zip Report, except possibly the Caneel Bay Hotel site, has adversely affected the subject tracts.

The U.S Environmental Protection Agency's (EPA's) Enviromapper System (http://www.epa.gov/enviro/emef) was also searched for the presence of environmental sites on or near the subject property. No sites of concern were identified on or near the property in the Enviromapper System.

No environmental cleanup liens were identified in connection with the subject or adjacent properties. However, Mr. Jim Strotman with the NPS Lands Office in Atlanta, Georgia stated that no title work was being conducted for the subject property because the property is owned by the NPS.

Copies of deeds and other information provided by the NPS indicate that the NPS has had ownership of the subject property land since 1956. In 1956, the property land was donated to the NPS by the Caneel Bay Plantation, Inc., a Rhode Island corporation.

A copy of survey maps of the subject tracts prepared in 2003 by Marvin Berning & Associates was provided by the NPS. No specific areas of concern were identified on the survey maps. A copy of the survey maps are provided in Attachment 6.

The following persons were interviewed regarding past and present activities on the subject property and adjacent properties:

- Mark Hardgrove and Rafe Boulon with VIIS.
- Nicoli Hotze and Alvin Nazario (current property owner representatives).
- Albert Francis with the Saint John Fire Department.

Contact records for the individuals interviewed are contained in Attachment 3. No previous property owner is believed to be available for interview.

The lack of a past property owner available for interview for this Level I Survey is considered a data gap. However, Mr. Rafe Boulon (with VIIS) has lived on Saint John for over 40 years and is familiar with the subject property. Mr. Boulon was interviewed for this Level I Survey. In addition, the historical documents reviewed for this Level I Survey (historical aerial photographs and topographic map) provide a good record of the past use of the subject property. Therefore, the past property owner interview data gap is not considered to be significant.

No RECs or historical RECs affecting the subject or adjacent properties were identified in the government agency search conducted for this Level I Survey; however, several potential RECs were identified during the interviews.

The following historical sources were obtained and reviewed:

- Aerial photographs dated 1947, 1999 and 2009. The 1947 aerial photograph indicates that the resort was not present on the subject property. The area where the main resort is today was partly cleared land and undeveloped woods and beaches with a few possibly residential or former plantation structures. No structures were present on the non-resort areas (marina and housing tracts); these properties appeared to be undeveloped. The adjacent properties were undeveloped woods, beaches, water bodies and a road (Highway 20). The 1999 and 2009 photographs indicate that the land use of the subject tracts was similar to the current land use (resort, marina and housing); the adjacent properties in 1999 and 2009 also appeared to be similar to the current land use (undeveloped woods, water bodies and a road).
- U.S. Geologic Survey (USGS) Western Saint John, V.I. Quadrangle Topographic Map dated 1958. The map was photo-revised in 1982. The 1958 and 1982 features on the topographic map indicate that the land use of the subject tracts was similar to the current land use (resort, marina and housing); the adjacent properties also appeared to be similar to the current land use (undeveloped woods, water bodies and a road).

Copies of the aerial photographs and the topographic map are included in Attachment 5.

Based on the sources reviewed and interviews conducted during the Level I Survey, the subject property and adjacent properties had the following historical uses:

Subject Property
1700s to early- to mid-1900s: Part of a plantation used for growing cotton and indigo, and/or cattle farming. (Source: Interviews.)

1947 to 1950s: Undeveloped woods, cleared land and beaches. (Sources: Interviews, historical aerial photographs and topographic map.)

1950s to Present: Undeveloped woods, beaches, resort, marina and residential areas. (Sources: Interviews, historical aerial photographs and topographic map.)

Adjacent Properties
1947 to Present: Undeveloped wooded land and water bodies (Caneel Bay, Turtle Bay, Hawksnest Bay) and a road (Highway 20). (Sources: Historical aerial photographs and topographic map.)

No RECs or historical RECs affecting the subject or adjacent properties were identified in the historical uses inquiry conducted for this Level I Survey.

A summary of the government records and historical sources reviewed is presented in the Checklist included in Attachment 3.

5.0 CONCLUSIONS AND RECOMMENDATIONS

No significant data gaps were identified during the performance of this Level I Survey. Based on the site inspection, interviews, and records search conducted for this Level I Survey, a number of RECs were identified in connection with the subject property. These RECs are associated with: the maintenance and engineering area; the landscaping and grounds maintenance area; the wastewater treatment plant; the emergency generator building; the emergency generator fuel tanks; the marina; the former fuel storage tanks for the marina; and the debris landfill. No historical RECs or environmental cleanup liens were identified in connection with the property. As a result, there is evidence of a potential for contaminants of concern, or the effects of contaminants of concern, to be present on the property. A Level II Survey on the property is recommended. For the purpose of this Level I Survey, contaminants of concern would include Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances, pollutants or contaminants, petroleum products, and/or other controlled substances (e.g., Drug Enforcement Agency [DEA] substances).

The following Level II activities are recommended for the subject property:

- Additional efforts should be made to locate any environmental reports or studies that may have been produced for the above mentioned RECs or other areas on the subject tracts. These reports may provide additional information that would be helpful for the subsequent Level II activities.
- A Level II work plan should be prepared which provides a detailed scope of work for Level II site investigation activities at each identified REC area. The Level II work plan should include soil, sediment, surface water and/or groundwater sampling, as appropriate for each REC area.
- The Level II work plan should be implemented to determine or confirm whether a significant release of hazardous substances or petroleum products to the environment has occurred at each REC area.

6.0 APPROVALS

Certifications by the Preparer, SSO Hazardous Materials Coordinator Reviewer, and Regional Director have been signed in Section H of the Checklist included as Attachment 3. Section H also includes a declaration that this Level I Survey was performed by an Environmental Professional.

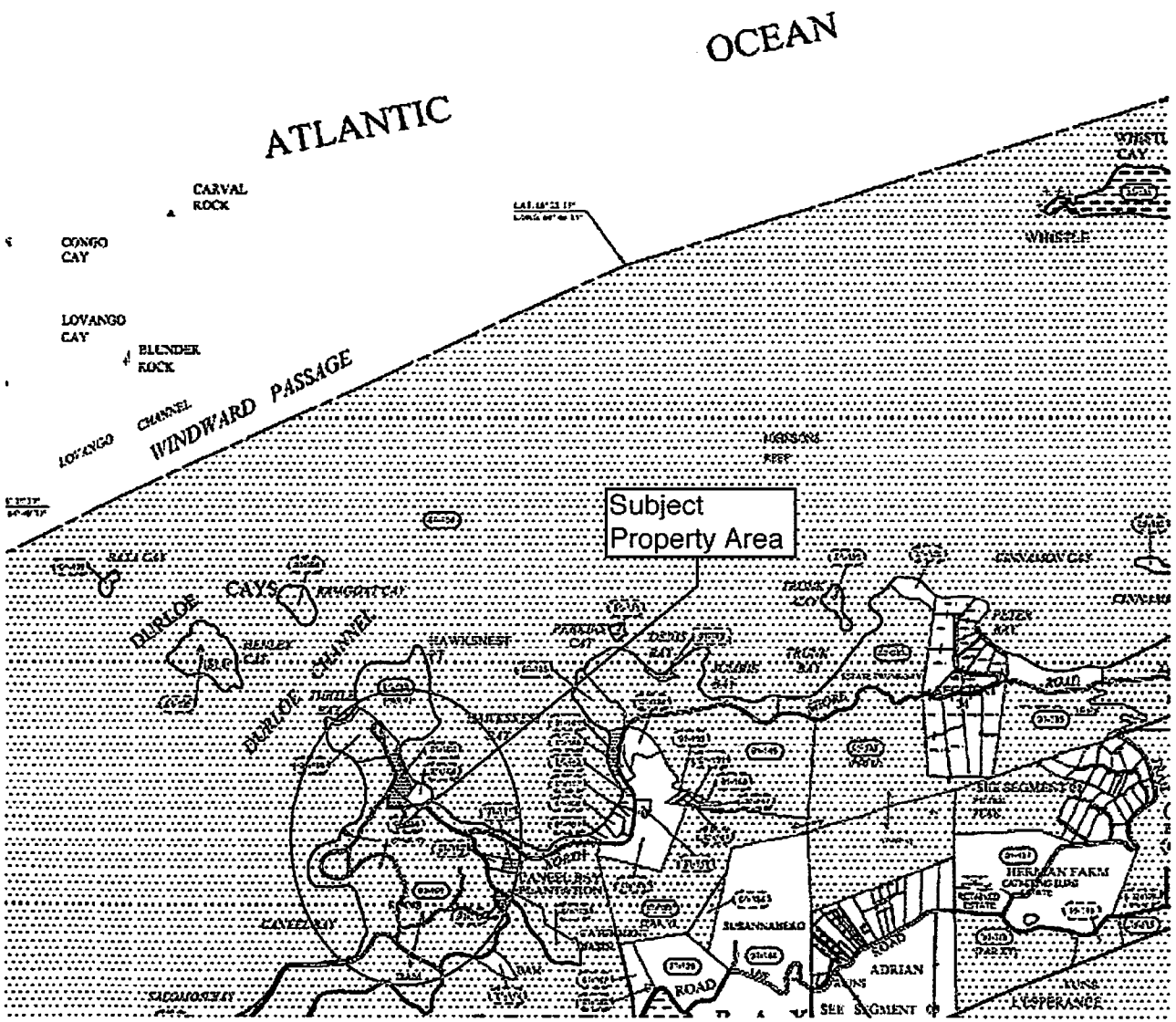
7.0 WARRANTY

B & A warrants this report only within the context of the approved Statement of Work with the NPS. Information contained in this report was available as of the date on this report. B & A is not responsible for any changes in site conditions after the inspection date, or changes to applicable regulations and statutes after the date of this report. Any information provided by third parties or the NPS and relied on by B & A to complete the Statement of Work is not warranted. Use of this report by parties other than the NPS or outside the context of the approved Statement of Work is not permitted without prior authorization from B & A.

ATTACHMENT 1

Site Location Maps

AR 000853



TRACT REGIS

DEED	TRACT	OWNER
	31-111	GEORGE, EDWARD
	31-112	GEORGE, ELEANOR
D-29, D-44	31-113	JACKSON ISLE RESERVE, INC.
D-29, D-44	31-114	JACKSON ISLE RESERVE, INC.
D-29, D-44	31-115	JACKSON ISLE RESERVE, INC.
D-29, D-44	31-116	JACKSON ISLE RESERVE, INC.
D-29, D-44	31-117	JACKSON ISLE RESERVE, INC.
	31-118	LAURANCE ROCKEFELLER
D-29, D-44	31-119	JACKSON ISLE RESERVE, INC.
	31-120	EL CID, SIDNEY ET UX.
D-29, D-44	31-121	JACKSON ISLE RESERVE, INC.
D-29, D-44	31-122	JACKSON ISLE RESERVE, INC.
D-29, D-44	31-123	JACKSON ISLE RESERVE, INC.
D-29, D-44	31-124	JACKSON ISLE RESERVE, INC.
	31-125	VIRGIN ISLAND GOVT.
	31-126	GLAISTER, DAVID M. JR., ET UX
	31-127	GEORGE, JOHN
	31-128	V.I. GOV MINIMUM
	31-129	DAVIES, EDWARD L., ET UX
	31-130	REALSEN, GALE H.
	31-131	DAVID, DAN STEVENS
	31-132	HULL, ROBERT B
	31-133	DONST, KLAUS P
	31-134	WEBER, MARION R
D-29, D-43	31-135	CANTEL BAY PLANTATION, INC.
D-29, D-43	31-136	JACKSON ISLE RESERVE, INC.
P-LR, D-4	31-137	REYNARDS, N. P.
P-LR, D-4	31-138	[illegible]
P-LR, D-4	31-139	KREIDER, HELENE G.
P-LR, D-43	31-140	[illegible]
V-LF, D-5	31-141	[illegible]
D-29, D-44	31-142	WEAVER GILBERT M., ALLEN, ET UX
P-LR, D-43	31-143	NATIONAL PARK FOUNDATION
	31-144	ELLISON, DAVID M. JR., ET UX
	31-145	[illegible]
	31-146	[illegible]
	31-147	WILDLIFE FIELD R.
	31-148	MORGAN, PHILIP L., ET AL
	31-149	PARRATT, ANNE D., ET AL
	31-150	RANDOLPH, DAVID C., GUARDIAN
TRA	31-151	UNITED STATES OF AMERICA DEPARTMENT OF JUSTICE

LEGEND

- PRIVATE LAND
- FEDERAL LAND (FEE)
- FEDERAL INTEREST (L
- OTHER FEDERAL LAN
- PUBLIC LAND
- PUBLIC LAND (LESS TI
- ACQUISITION DEFERR
- XX-XXX TRACT NUMBER (FEE)
- XX-XXX TRACT NUMBER (LESS
- TRACT BOUNDARY
- PARK BOUNDARY

GENERAL NOTES

1. [illegible]
2. [illegible]

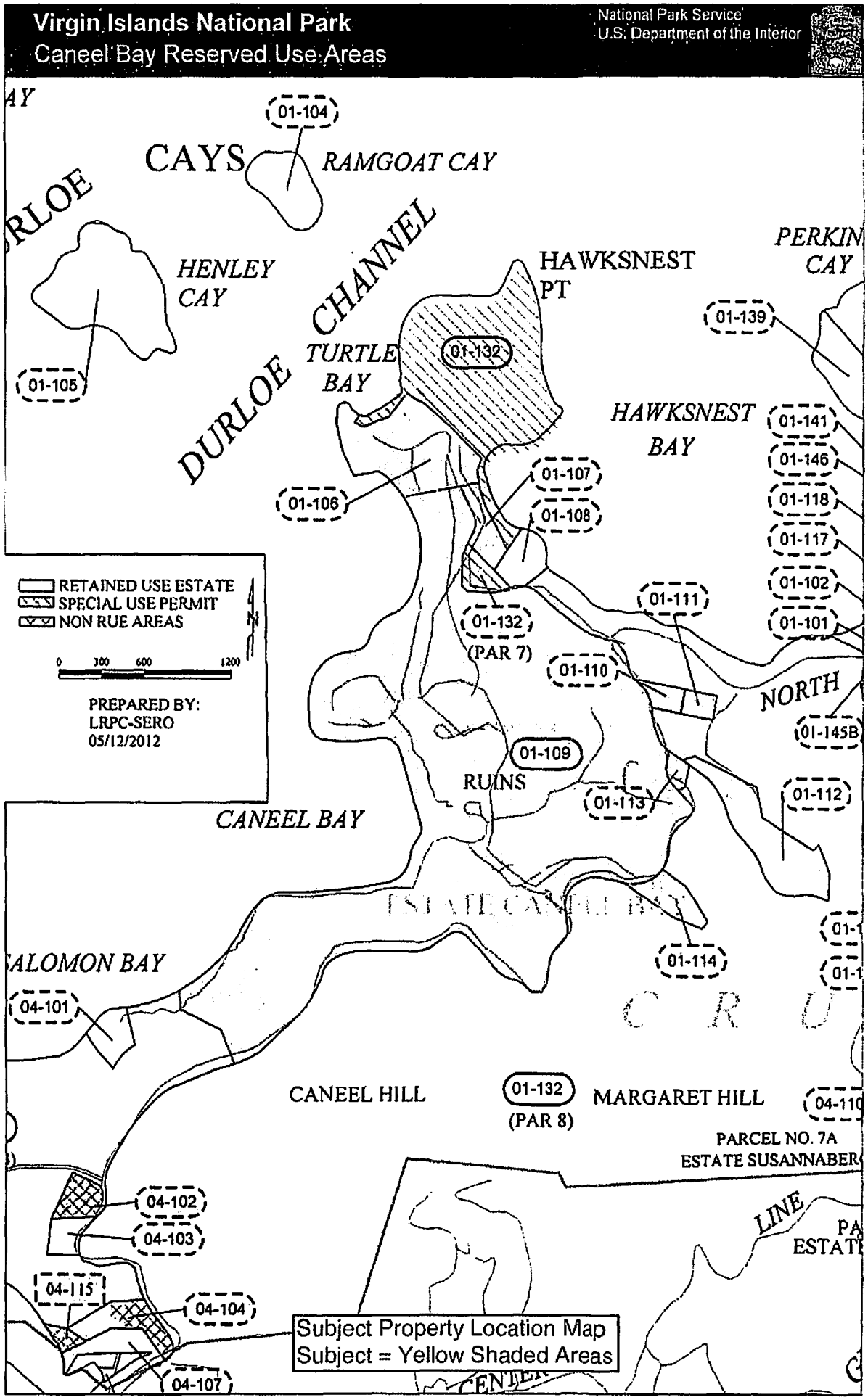
ESTABLISHED:	DECEMBER 1, 1956
BOUNDARY CHANGE:	OCTOBER 5, 1962
DATE DRAWN:	JUNE 1981
MAINTAINED BY:	THE LAND RESOURCES DIVISION, SOUTHEAST REGION
DATE REVISED:	JANUARY, 2001

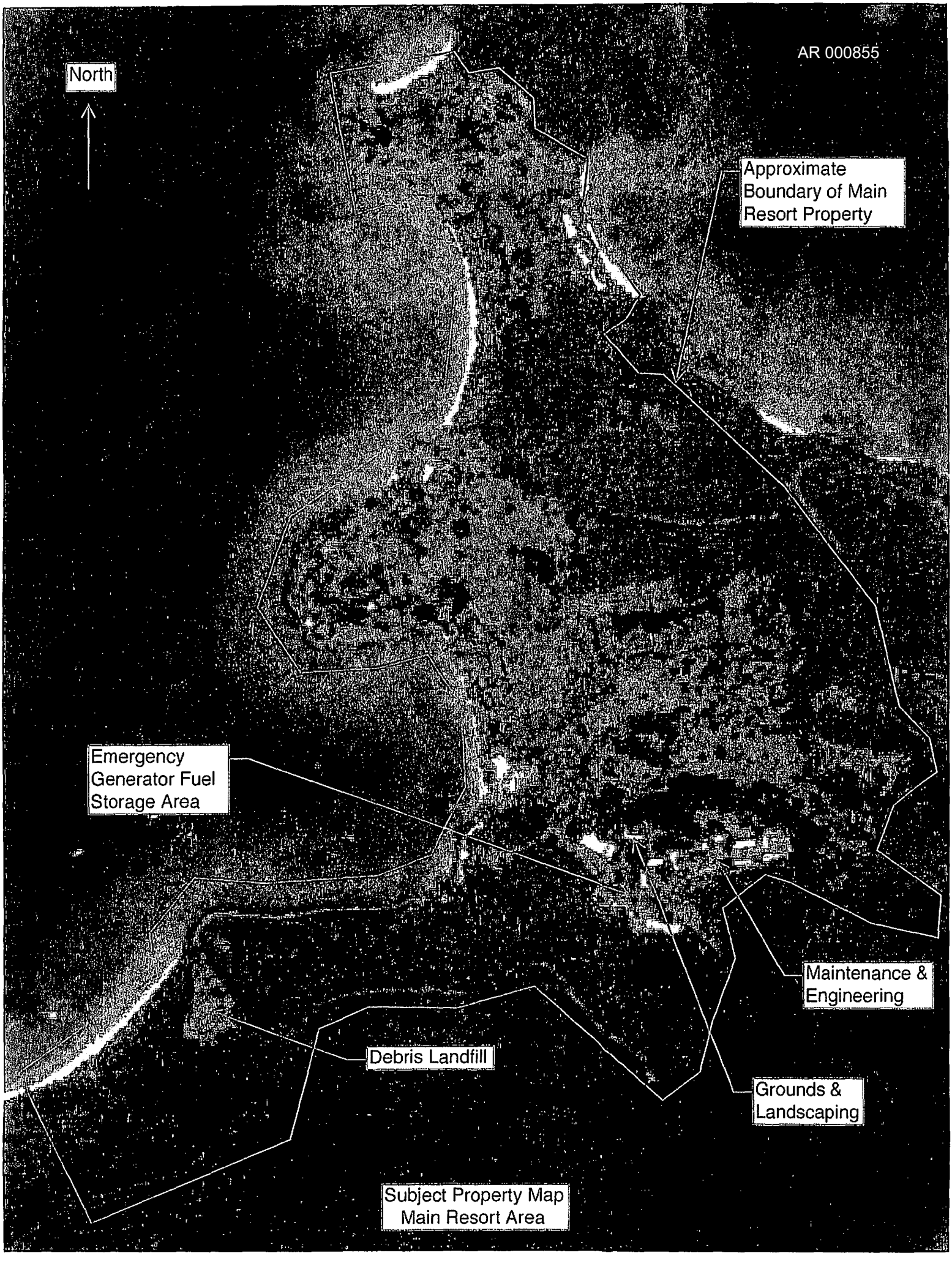
UNITED STATES
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
LAND RESOURCES PROGRAM CENTER

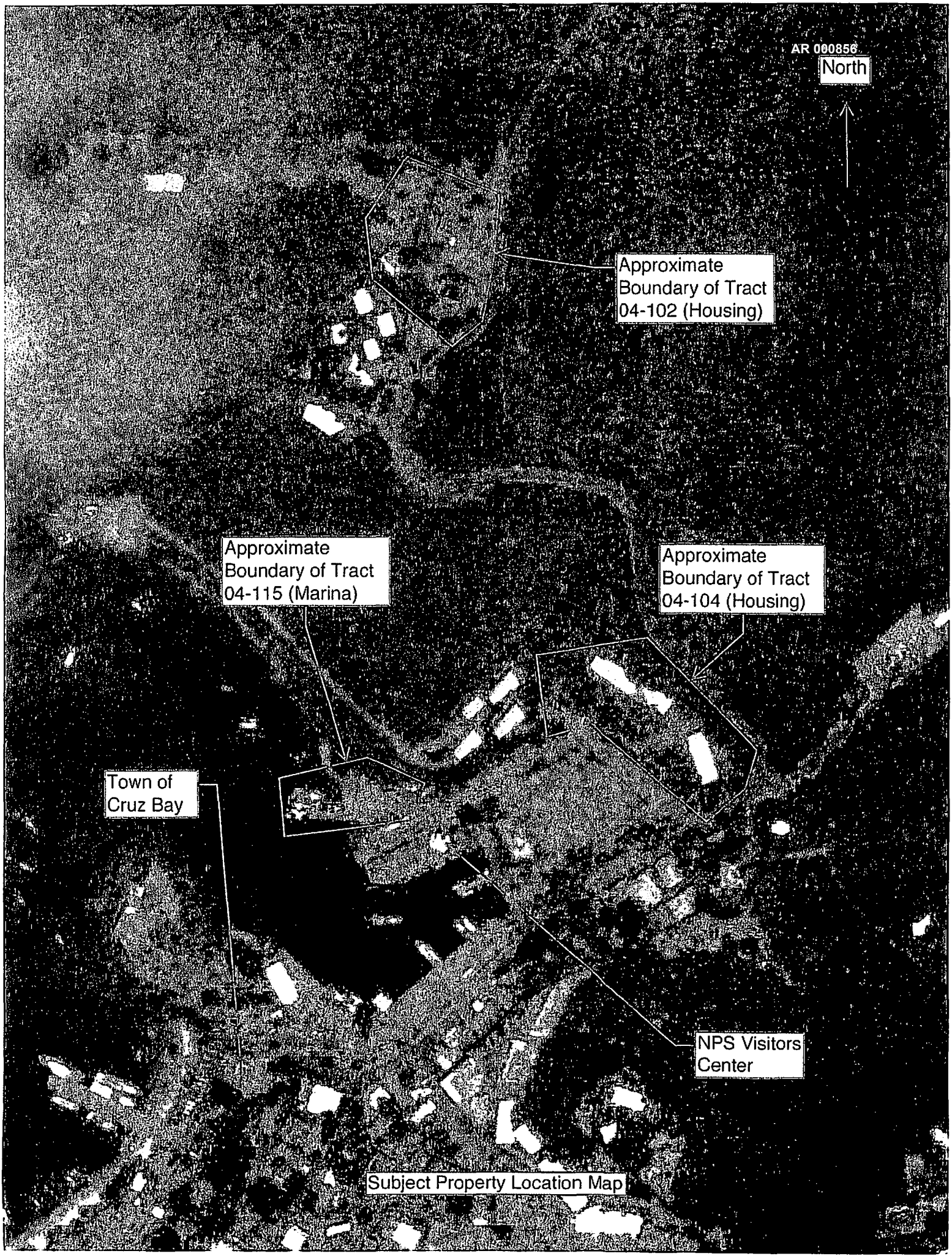
VIRGIN ISLA
NATIONAL P

ST. JOHN ISLAND
VIRGIN ISLANDS

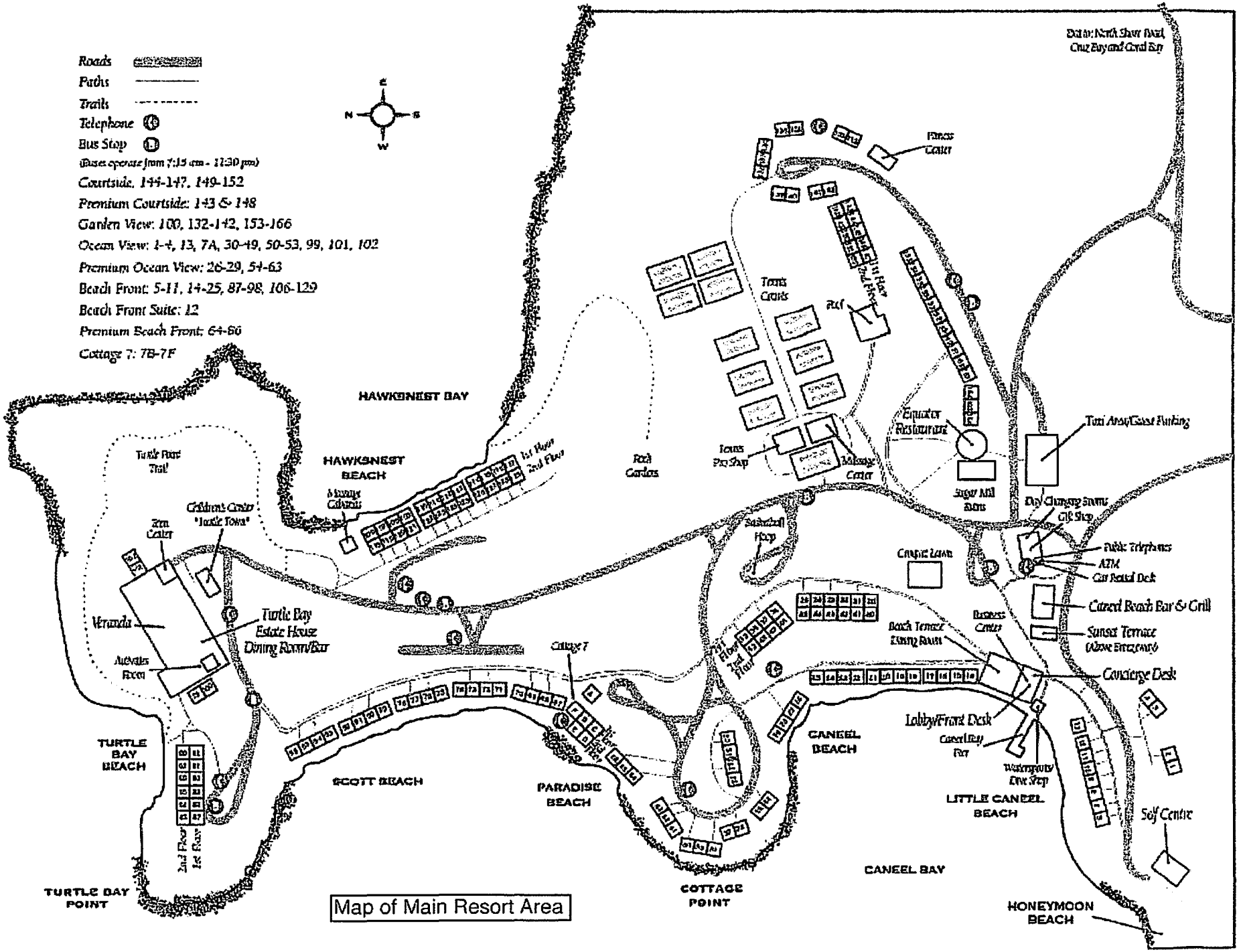
SEGMENT 01


Virgin Islands National Park
Caneel Bay Reserved Use Areas
National Park Service
U.S. Department of the Interior
CAYS
RAMGOAT CAY
HENLEY CAY
DURLOE CHANNEL
TURTLE BAY
HAWKSNEST PT
PERKIN CAY
HAWKSNEST BAY
01-104
01-105
01-106
01-107
01-108
01-132
01-139
01-141
01-146
01-118
01-117
01-102
01-101
01-111
01-110
01-109
01-113
01-112
01-145B
01-114
RETAINED USE ESTATE
SPECIAL USE PERMIT
NON RUE AREAS
0 300 600 1200
PREPARED BY:
LRPC-SERO
05/12/2012
(PAR 7)
RUINS
CANEEL BAY
NORTH
ALOMON BAY
04-101
CANEEL HILL
(PAR 8)
MARGARET HILL
PARCEL NO. 7A
ESTATE SUSANNABER
04-102
04-103
04-115
04-104
04-107
LINE
Subject Property Location Map
Subject = Yellow Shaded Areas


North
Approximate Boundary of Main Resort Property
Emergency Generator Fuel Storage Area
Maintenance & Engineering
Debris Landfill
Grounds & Landscaping
Subject Property Map
Main Resort Area



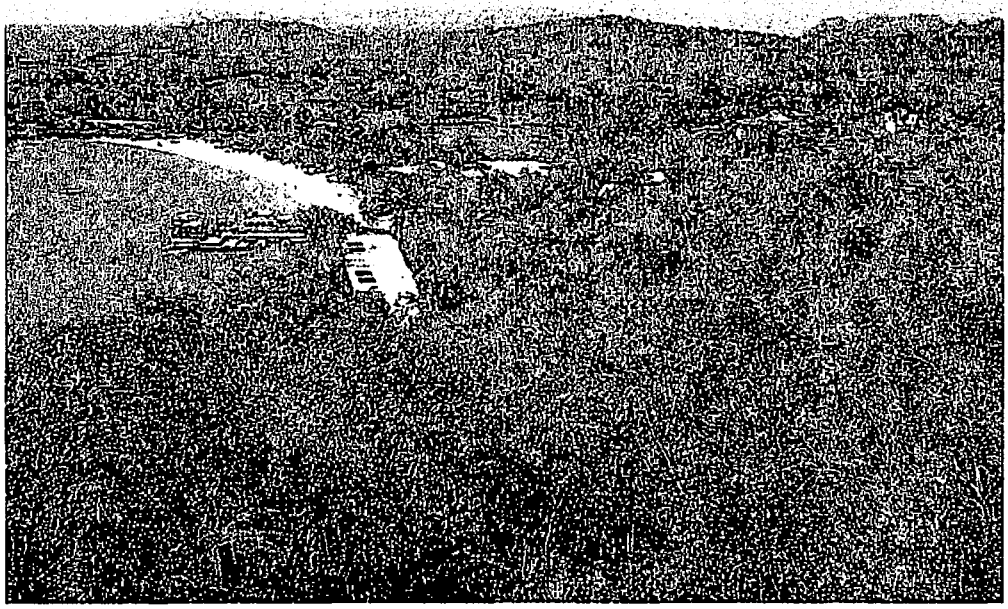
Subject Property Location Map



Map of Main Resort Area

ATTACHMENT 2

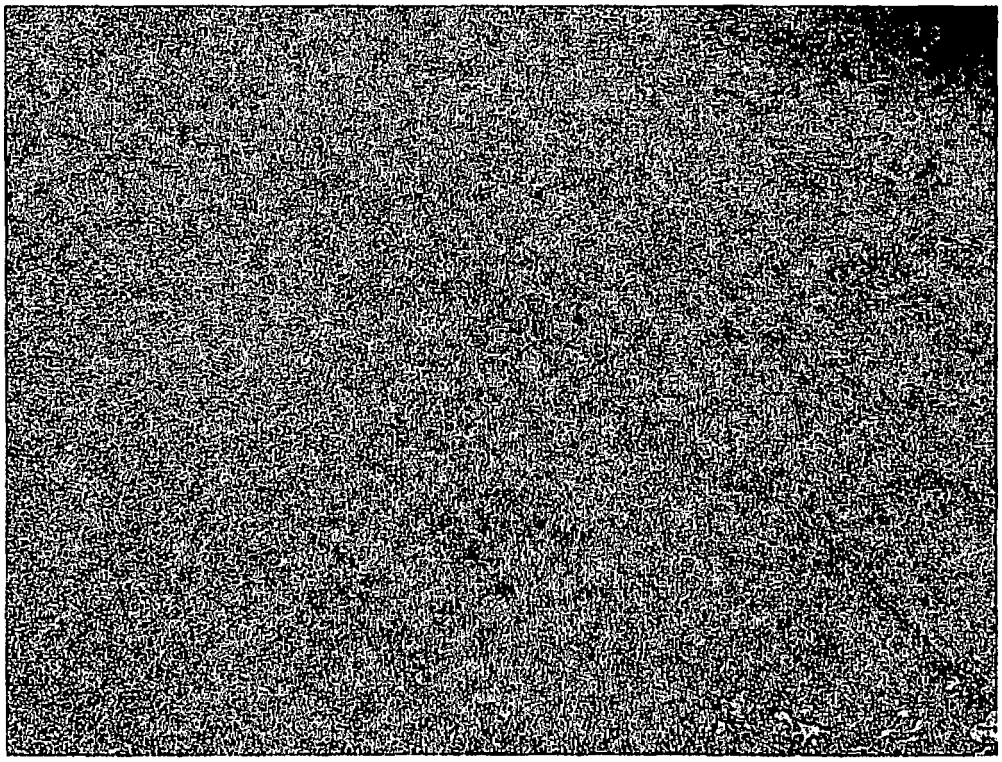
Site Photographs



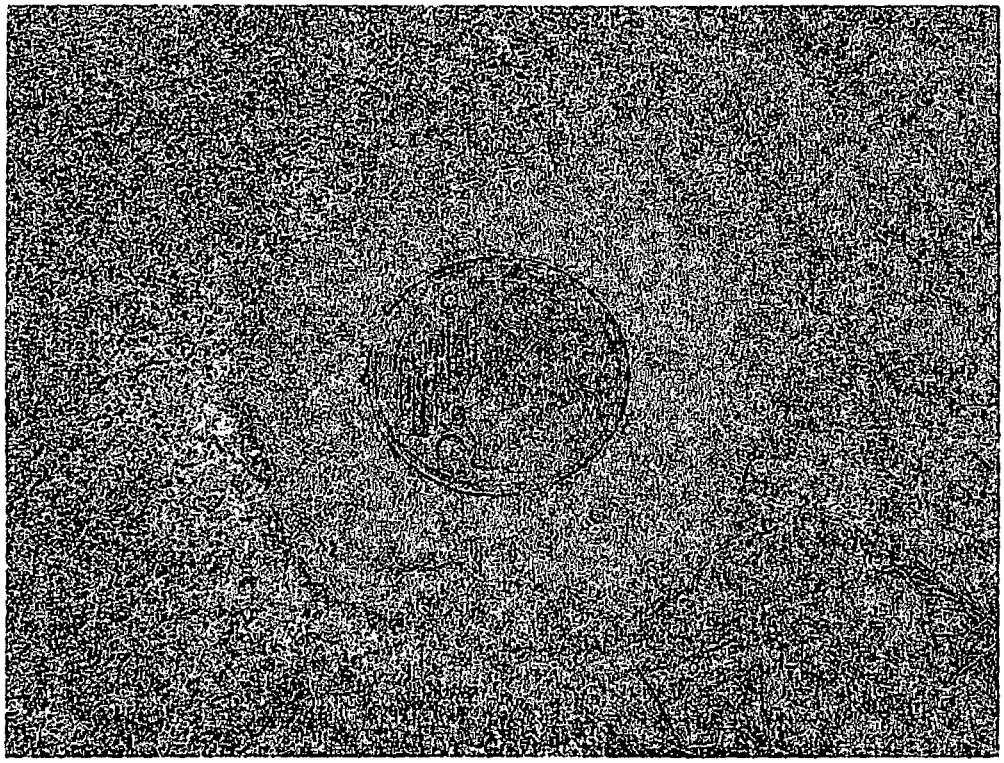
North View of Main Resort Area

Engineering & Maintenance Area in Southeast Part of Subject Property

Waste Oil Storage Area in Engineering & Maintenance Area

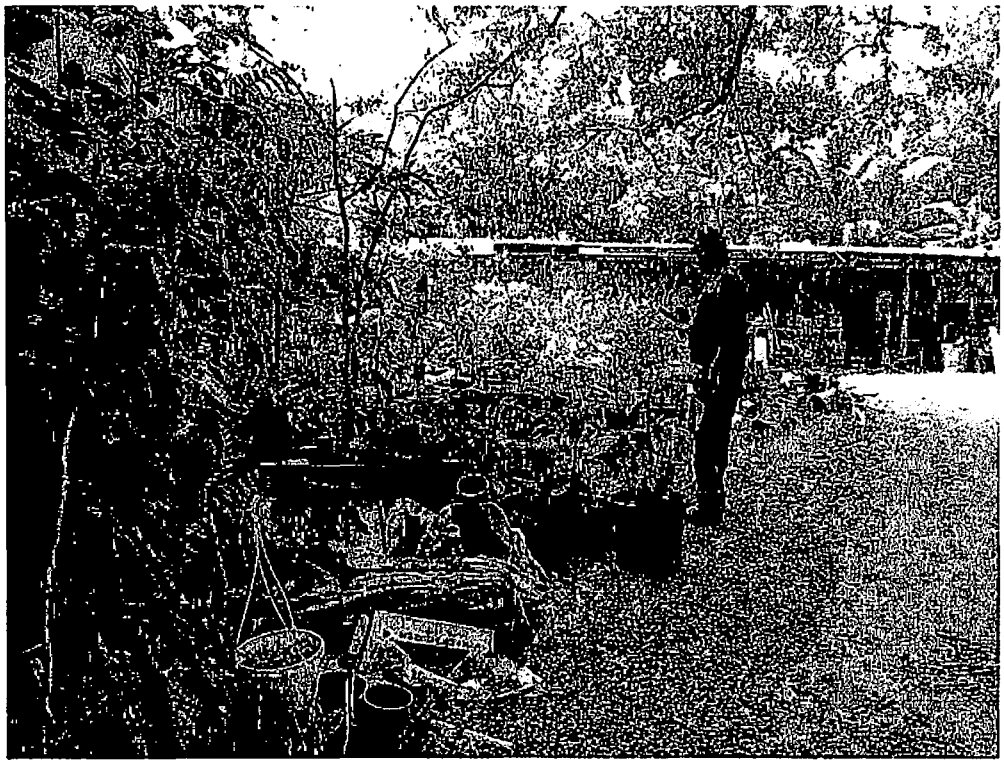


Oil Stained Concrete Floor in Engineering & Maintenance Area



Monitoring Well in Pavement Near Diving Storage Building in Engineering & Maintenance Area

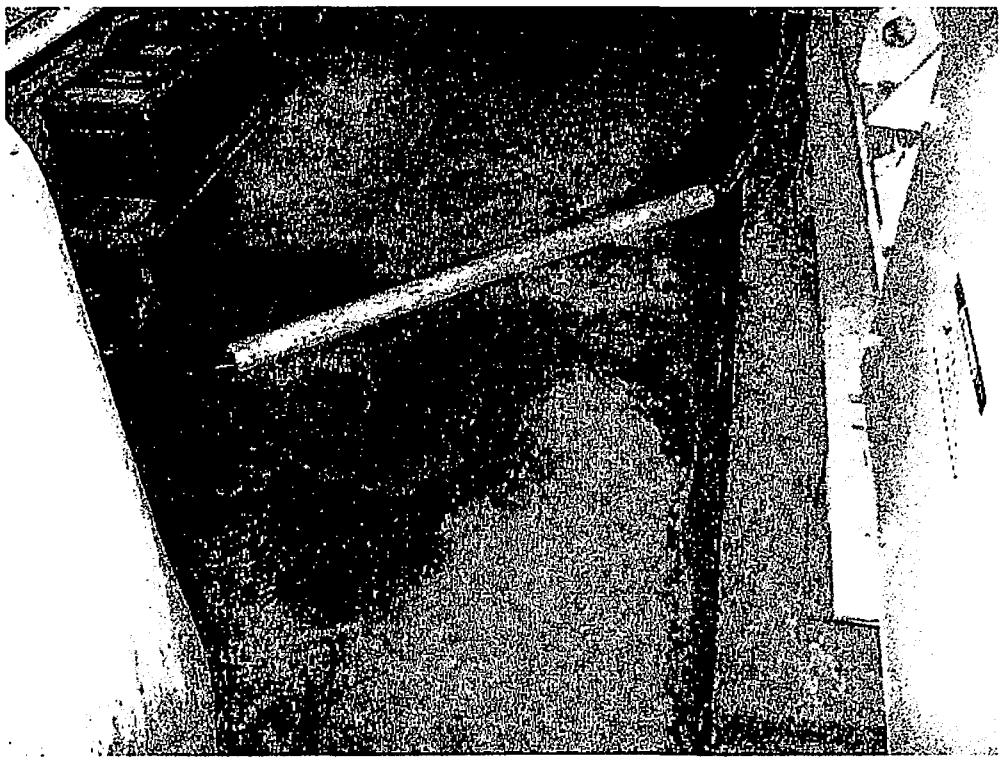
Automotive Batteries & Stained Concrete Floor in Engineering & Maintenance Area



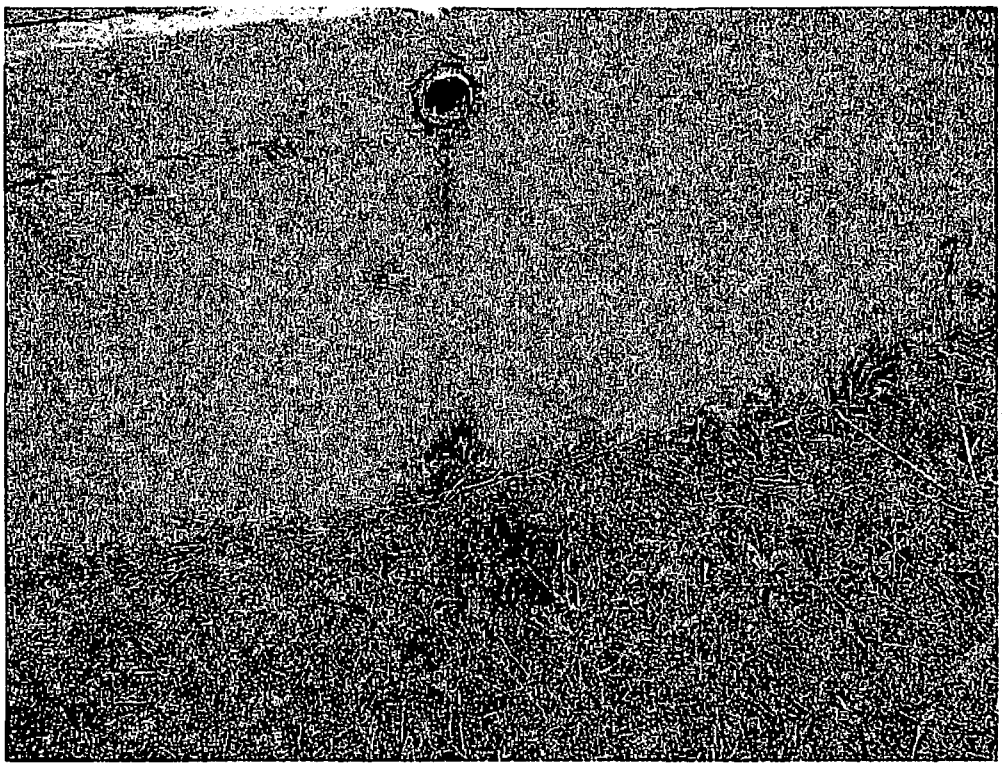
Grounds & Landscaping Area in Southeast Part of Subject Property

Fertilizer Spilled on Ground in Storage Shed in Grounds & Landscaping Area

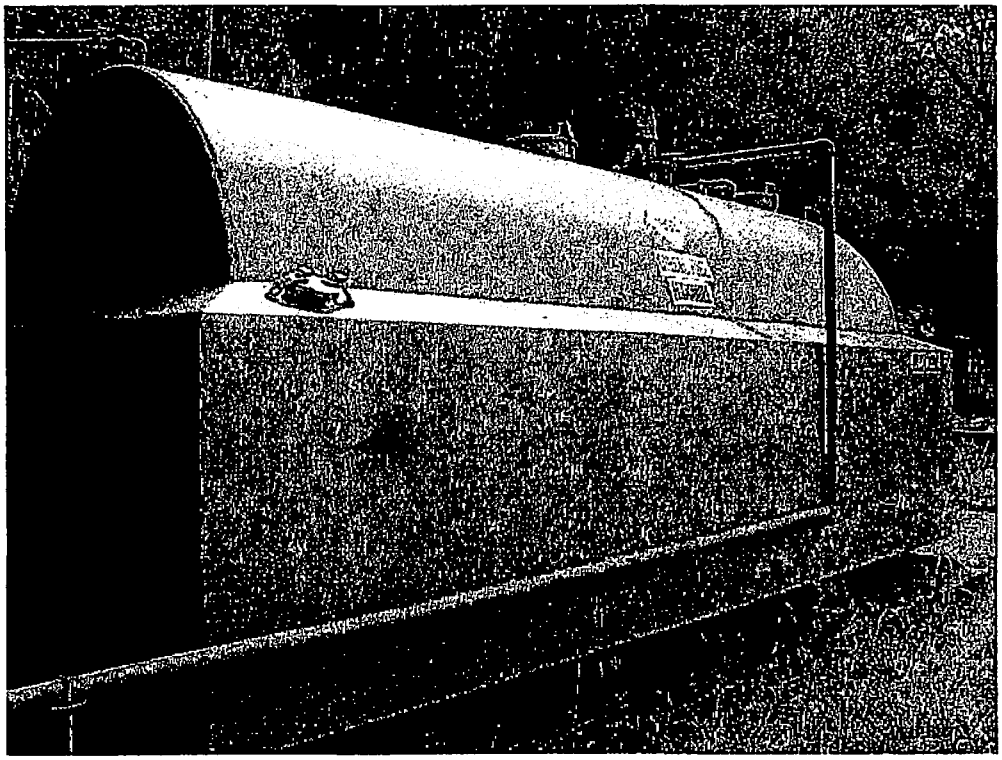
Open Container of Waste Oil in Building in Grounds & Landscaping Area



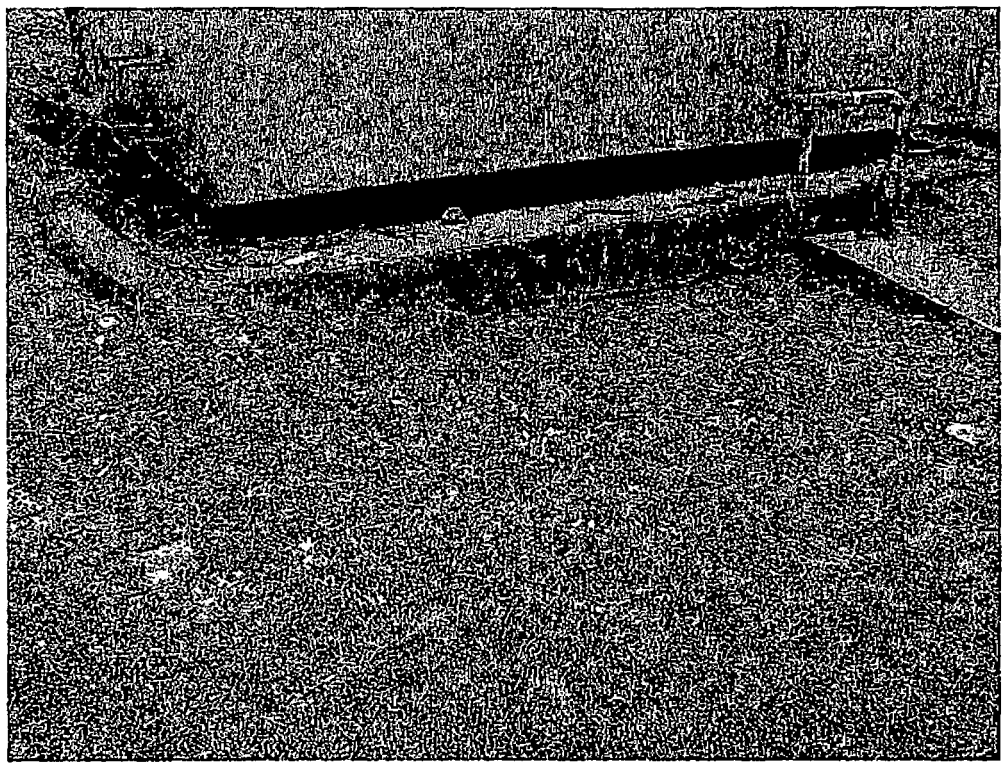
Oil & Batteries on Concrete Floor of Emergency Generator Building



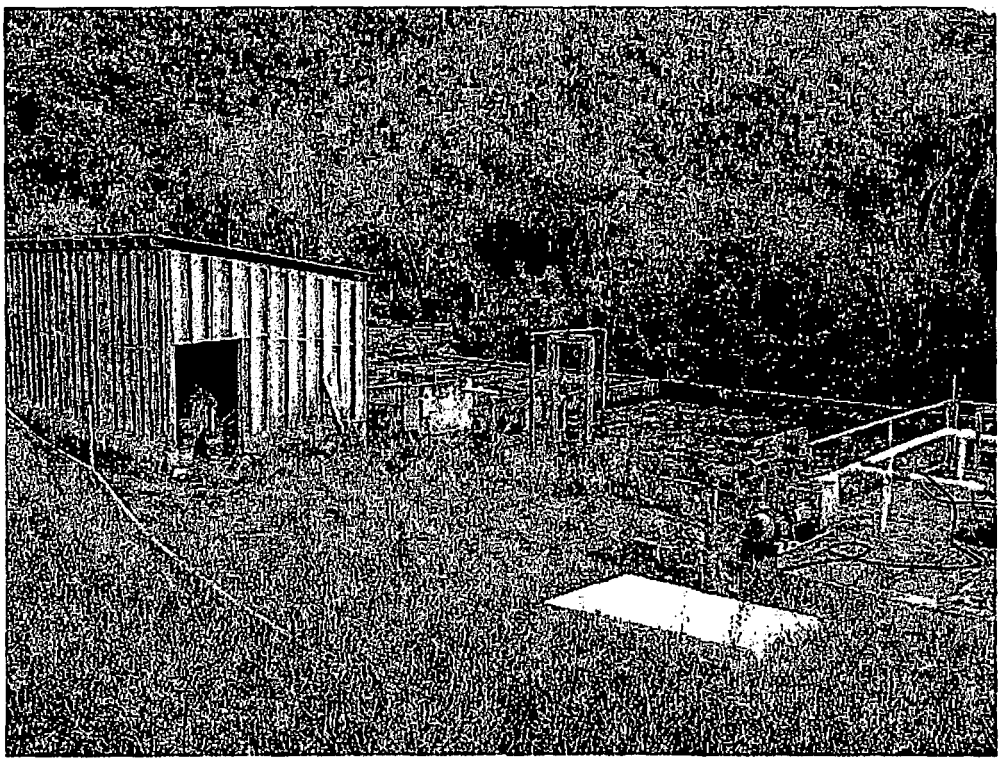
Oil Discharge From Floor of Emergency Generator Building to Soil Outside Building



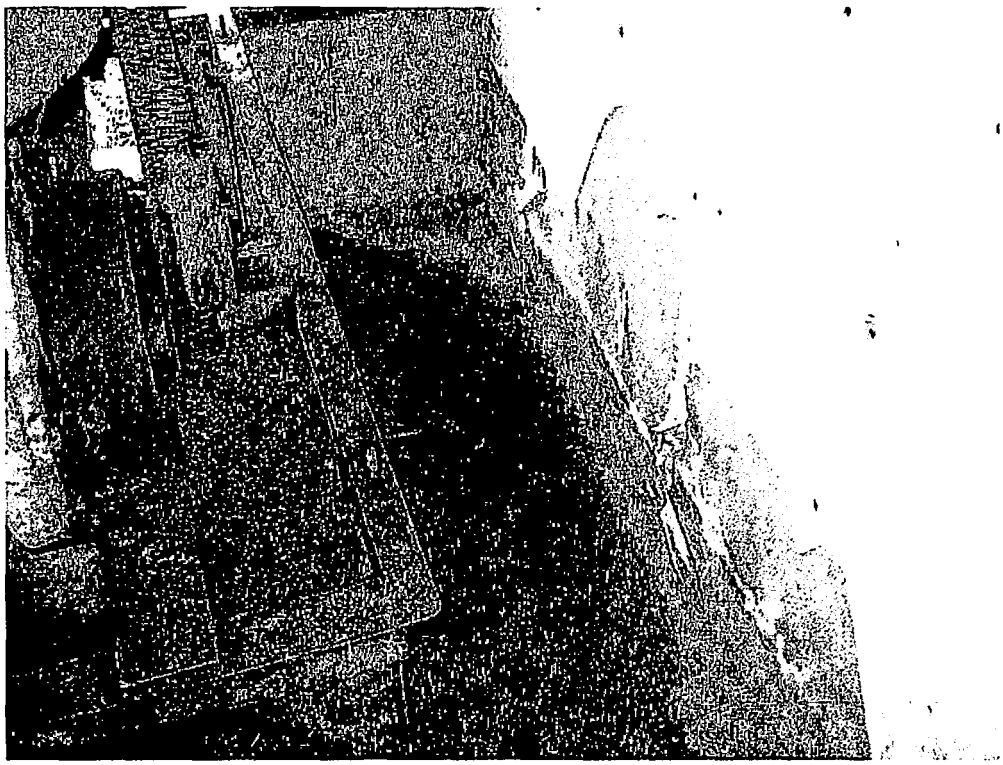
Above Ground Diesel Fuel Storage Tank for Emergency Generator



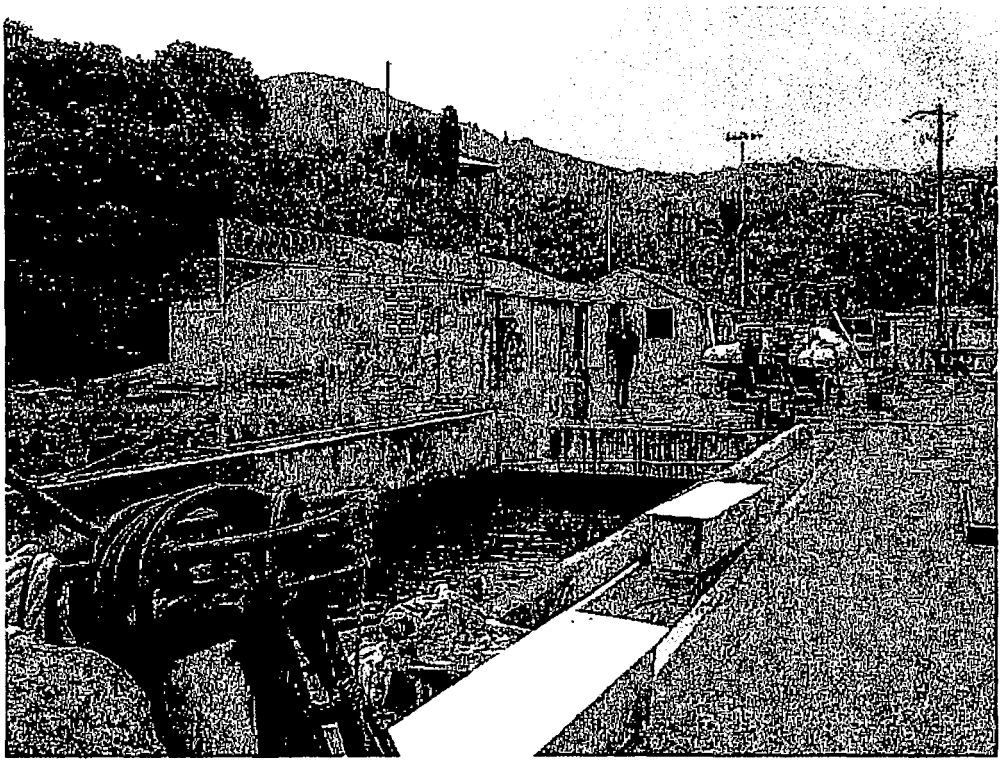
Distressed Vegetation & Fuel Impacted Soil Near Gasoline Fuel Tank North of Generator Building



Wastewater Treatment Plant Area

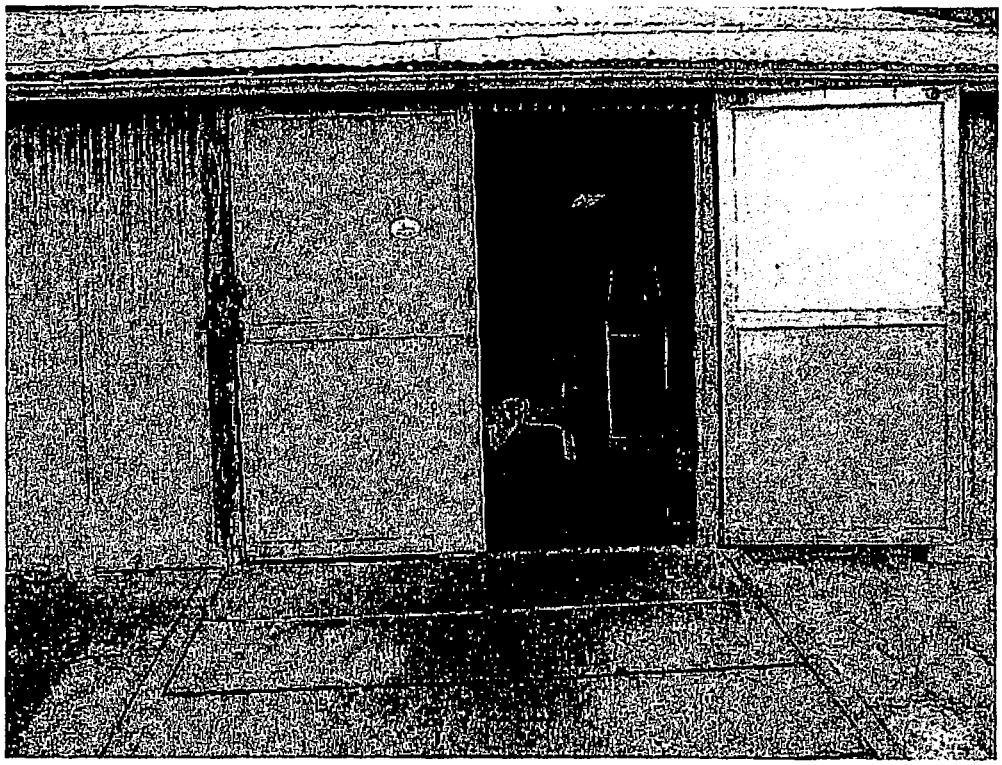


Oil Stained Floor Near Pump in Building at Wastewater Treatment Plant

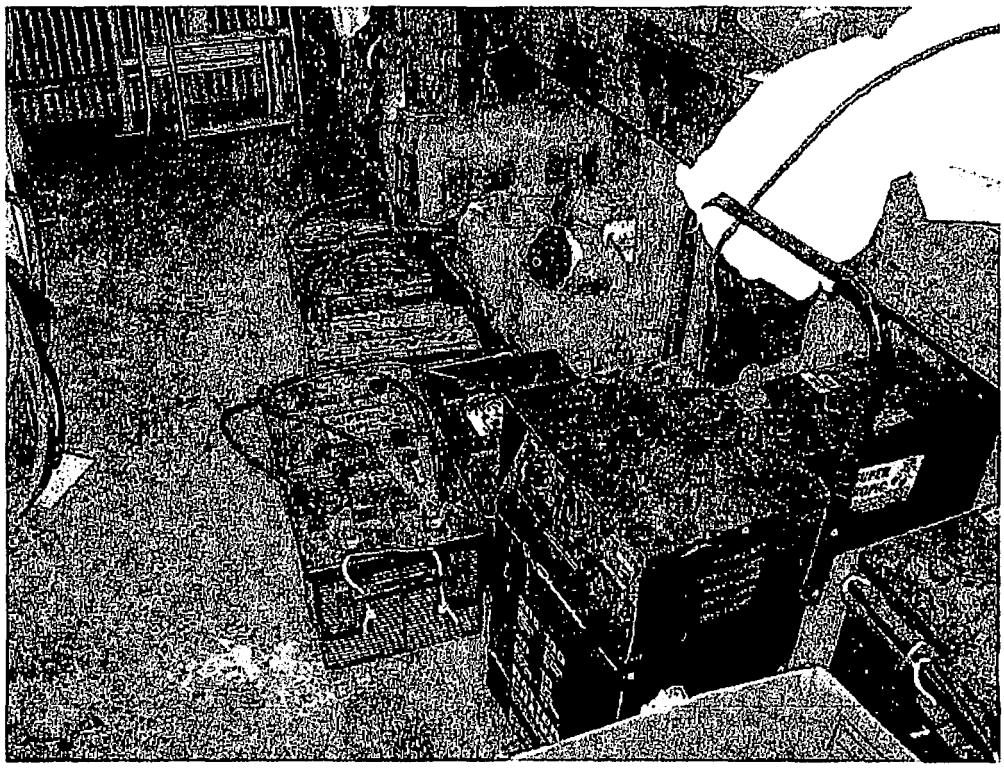


Marina Facility on Tract 04-115

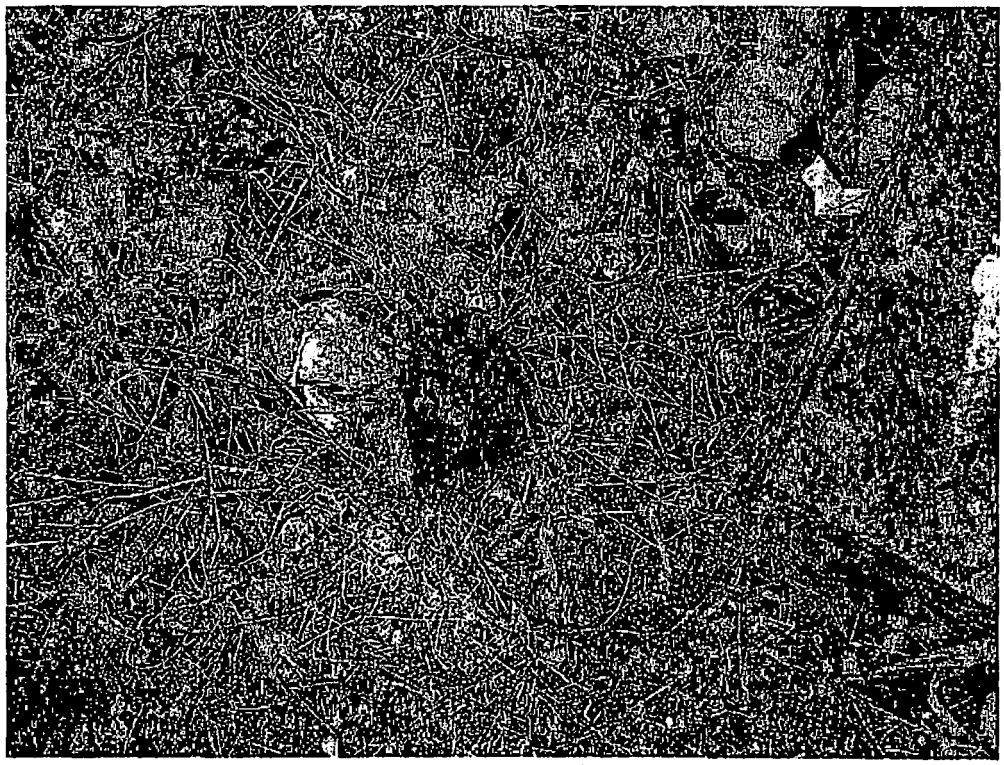
Above Ground Fuel Storage Tanks at Marina Facility



Oil Stained Pavement Near West Building of Marina Facility



Batteries & Stains on Floor of West Building of Marina Facility



Polyurethane Resin on Ground at Marina Facility

Area of Former Above Ground Fuel Storage Tanks on Tract 04-104 (in foreground)

Concrete Structure in Area of Former Above Ground Fuel Storage Tanks on Tract 04-104

Debris Landfill Near Honeymoon Beach

ATTACHMENT 3

NPS Level I Survey Checklist

NPS Level I Survey
Checklist
for Proposed Real Estate Acquisitions

General Instructions: Please read all sections carefully prior to conducting the site walk. This Checklist incorporates two levels of inquiry, according to the presence of human intrusion on the land. All sections of the Checklist must be completed for Improved Properties. Section C of the Checklist may be excluded for Unimproved Properties. For a complete definition of Improved/Unimproved Properties refer to the Guidance Manual. Fill out all applicable sections, using blue or black ink, and do not leave any applicable questions blank. Sign and date Section H.1.

A. Property Description

The following information should be available from the Land Acquisition Office. Attach a legal description, site map or land acquisition segment map of all properties, and photographs of Improved Properties.

NPS Unit	Virgin Islands National Park
Tract/Plot No.	Various
Tract Owner	Caneel Bay Resort
Size of Tract	150.32 Acres Total
Current Land Use	Resort, marina and employee housing

Adjacent Land Use

- North – Turtle Bay and undeveloped wooded land.
- South – Undeveloped wooded land and Highway 20.
- East – Hawksnest Bay and undeveloped wooded land.
- West – Caneel Bay.

Date of Survey	9/4/12

B. Site Inspection Screening - All Properties

Section B should be completed for all properties (Improved and Unimproved). For each item, provide the basis for the answer (visual observation, interviews, or own knowledge or deduction). In the event that different sources identify conflicting information, please provide an explanation in the Comments section of that item. If "Yes" is checked for any item, briefly describe the condition in the Comments section or, if more space is needed, in an attachment. Refer to the Guidance Manual for examples and explanation of the conditions discussed in each item.

Item	Observed Condition	Answer	Basis for Answer	Comments
1	**Property Use:** Is the property **currently** or was it **previously** used for an industrial purpose? (i.e., any use which involves the processing, handling, management, disposal, storage, manufacture, or transportation of hazardous substances or petroleum products).	**Currently** (X) Yes ( ) No ( ) Unk **Previously** (X) Yes ( ) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	The property includes areas of former and current use, storage and spillage of hazardous substances and petroleum products.
2	Is any adjoining property **currently** or was it **previously** used for an industrial use?	**Currently** ( ) Yes (X) No ( ) Unk **Previously** ( ) Yes (X) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	
3	**Fill Dirt:** Is there evidence of fill dirt brought onto the property, as evidenced by modified topography?	( ) Yes (X) No ( ) Unk	(X) Observed (X) Interviews ( ) Knowledge	

Item	Observed Condition	Answer	Basis for Answer	Comments
4	**Water Bodies:** Is there evidence of **current** or **previous** pits, ponds, lagoons, or other water bodies located on the property in connection with waste treatment or waste disposal, or in which a sheen, or discoloration was observed.	**Currently** ( ) Yes (X) No ( ) Unk **Previously** ( ) Yes (X) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	
5	**Dumps and Landfills:** Is there any evidence of waste materials **currently** or **previously** being dumped above grade, buried, and/or burned on the property? If yes, describe the waste materials. Could the wastes easily be properly disposed of into a municipal trash dumpster?	**Currently** ( ) Yes (X) No ( ) Unk **Previously** ( ) Yes (X) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	
6	**Distressed Vegetation:** Is there vegetation on the property or adjoining properties which appears different, for no apparent reason, from the surrounding vegetation (e.g., bare ground, distressed vegetation)?	(X) Yes ( ) No ( ) Unk	(X) Observed (X) Interviews ( ) Knowledge	An approximately 5' by 12' area of distressed vegetation and fuel-stained soil was observed just east of the 10,000-gallon gasoline AST near the emergency generator building; the leaked fuel appeared to be gasoline. The depth of the fuel-impacted soil was more than 6 inches.
7	**Owner or Occupant:** Has the owner or occupant been informed of the current or past existence of hazardous substances, petroleum products, or environmental violations with respect to the property or any facility located on the property?	(X) Yes ( ) No ( ) Unk	( ) Observed (X) Interviews ( ) Knowledge	A diesel fuel leak is reported to have occurred two years ago near the emergency generator building; the fuel-impacted soil is reported to have been excavated, covered with a tarp and placed on a concrete pad near the ASTs.
8	**Environmental Assessments:** Is there evidence, or does the owner or occupant have knowledge of, any environmental site assessment of the property or facility that indicated the presence of hazardous substances or petroleum products on, or contamination of, the property or recommended further assessment of the property?	(X) Yes ( ) No ( ) Unk	(X) Observed (X) Interviews ( ) Knowledge	

Item	Observed Condition	Answer	Basis for Answer	Comments
9	**Violations**: Is there evidence of any environmental liens, past or recurrent violations of environmental laws or similar governmental notifications made to any owner or operator of the property or with respect to any facility located on the property?	( ) Yes ( ) No (X) Unk	( ) Observed (X) Interviews ( ) Knowledge	
10	**Lawsuits**: Is there evidence of any past, threatened, or pending lawsuits, administrative or judicial proceedings, consent agreements or related actions concerning a release or threatened release of any hazardous substance or petroleum product involving the property by any owner or occupant of the property?	( ) Yes (X) No ( ) Unk	( ) Observed (X) Interviews ( ) Knowledge	
11	**Federal to Federal Transfer**: In acquiring land from another Federal agency, has that agency notified the Department or Bureau of the past or current presence of any hazardous substance generated, stored, released, or disposed at the property?	( ) Yes ( ) No ( ) Unk (X) NA	( ) Observed ( ) Interviews ( ) Knowledge (X) NA	

C. Site Inspection Screening - Improved Properties

Section C should be completed for Improved Properties only (i.e., any evidence of past or present human intrusion on the land). If the property being surveyed is Unimproved, proceed to Section D. For each item below, provide the basis for the answer (visual observation, interviews, or own knowledge or deduction). In the event that different sources identify conflicting information, please provide an explanation in the Comments section of that item. If "Yes" is checked for any item, briefly describe the condition in the Comments section or, if more space is needed, in an attachment. Refer to the Guidance Manual for examples and explanation of the conditions discussed in each item. (Note: B & A completes Section C for all properties).

Item	Observed Conditions	Answer	Basis for Answer	Comments
12	**Chemical Storage**: Is there evidence of **current** or **previous** storage or use of industrial drums (typically 55 gallons) or sacks of chemicals, automotive or industrial batteries, pesticides, paints, solvents, or other chemicals in individual containers larger than 5 gallons in volume, or 50 gallons in the aggregate at the property?	**Currently** (X) Yes ( ) No ( ) Unk **Previously** (X) Yes ( ) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	These materials are present in the engineering and landscaping areas of the main resort.
13	**Staining**: Is there **currently** or is there evidence of **previous** staining on the property of the soil, cracked concrete, asphalt, adjacent to stormwater drains, or other surfaces?	**Currently** (X) Yes ( ) No ( ) Unk **Previously** ( ) Yes (X) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	Several areas of oil-stained concrete floors and soil are present.
14	Are there **currently** or has there **previously** been any flooring, drains, or walls located on the property that are stained by substances other than water or are emitting foul odors?	**Currently** (X) Yes ( ) No ( ) Unk **Previously** ( ) Yes (X) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	Several areas of oil-stained concrete floors and soil are present.

Item	Observed Conditions	Answer	Basis for Answer	Comments
15	**Storage Tanks**: Are there **currently** or was there **previously** any aboveground or underground storage tanks on the property or indications of aboveground or underground storage tanks, such as any vent pipes, fill pipes, access ways indicating a fill pipe, concrete or asphalt pads or patches, islands, or dispensers on the property or adjacent to any structure on the property?	**Currently** (X) Yes ( ) No ( ) Unk **Previously** (X) Yes ( ) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	
16	**Domestic Wells**: If the property is **currently** or was **previously** served by a private well or non-public water system, has the well been designated as contaminated by any government environmental/health agency or has testing been performed which has identified contamination? If yes, do the contaminants exceed guidelines applicable to drinking water? Attach copies of water quality reports, if available.	**Currently** ( ) Yes (X) No ( ) Unk **Previously** ( ) Yes (X) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	
17	**Monitoring Wells**: Is there evidence of **current** or **previous** monitoring wells (e.g., groundwater or soil vapor extraction wells) on the property which contained contaminants? If yes, indicate the type of well and the test results.	**Currently** ( ) Yes ( ) No (X) Unk **Previously** ( ) Yes ( ) No (X) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	A monitoring well is present in the engineering area of the main resort. The well is reported to have been installed for an underground fuel storage tank that was removed. It is unknown if the well contained contaminants.
18	**Wastewater Discharges**: Other than stormwater or sanitary wastewater discharges from restrooms, kitchens, or other household-type uses, does the property **currently** or has it **previously** discharged wastewater on or adjacent to the property? If yes, identify type of wastewater and contaminants, if known.	**Currently** ( ) Yes (X) No ( ) Unk **Previously** ( ) Yes (X) No ( ) Unk	**Currently** (X) Observed (X) Interviews ( ) Knowledge **Previously** (X) Observed (X) Interviews ( ) Knowledge	
19	**Septic Systems**: Has the property ever been connected to an on-site septic system?	( ) Yes (X) No ( ) Unk	(X) Observed (X) Interviews ( ) Knowledge	

Item	Observed Conditions	Answer	Basis for Answer	Comments
20	**PCBs**: Are there transformers, capacitors, or any hydraulic equipment (e.g., elevators, presses, lifts, and doors) on the property? If yes, is there any evidence of leakage, or the presence of PCBs, or of a manufacture date prior to 1980?	(X) Yes ( ) No ( ) Unk	(X) Observed (X) Interviews ( ) Knowledge	Some areas of oil leakage were observed near various pumps and other equipment.
21	**Lead-Based Paint**: Are there structures on site, including water towers, with identified lead-based paint, or which were built prior to 1978 (or of unknown construction dates) with painted surfaces which are peeling or flaking? If yes, indicate if NPS intends to demolish the structure, or what use is intended for the structure.	(X) Yes ( ) No ( ) Unk	(X) Observed (X) Interviews ( ) Knowledge	Painted structures built prior to 1978 are present on the property. The structures are not planned for demolition. No lead based paint testing was conducted.
22	**Asbestos**: Are there structures on site containing identified asbestos-containing materials (ACMs) or with suspect ACMs? If a prior asbestos survey has been performed, please attach a copy.	( ) Yes ( ) No (X) Unk	(X) Observed (X) Interviews ( ) Knowledge	No asbestos testing was conducted.

D. Record Searches

D.1 Government Records

Please indicate the number of identified or suspected facilities within each of the categories, as discovered during the record search. For those identified, please provide additional information as an attachment to this questionnaire concerning the facilities, and include your NPS Contact Record(s) as an attachment, if applicable.

Table D-1

Regulatory Listing	Site	Adjacent	Within ½ mile	½ to 1 mile (minimum)
NPL: National Priorities List - federal Superfund Sites.	0	0	0	0
CERCLIS: Comprehensive Environmental Response, Compensation, and Liability, Information System – federal list of known or suspected hazardous substance contamination sites.	0	0	0	0
RCRA-TSD: Resource, Conservation, and Recovery Act, Treatment Storage and Disposal Facilities - federal list of hazardous waste treatment, storage, and disposal facilities.	0	0	0	0
CORRACTS: Corrective Action Report - federal list of hazardous waste treatment storage and disposal facilities at which corrective remedial action is underway.	0	0	0	0
State equivalent of NPL: State list of hazardous waste sites identified for remediation or investigation.	0	0	0	0
State equivalent of CERCLIS: State list of sites identified for remediation or investigation.	0	0	0	0

Regulatory Listing	Site	Adjacent	Within ½ mile	½ to 1 mile (minimum)
LUST: Leaking Underground Storage Tank sites - State or County list of underground storage tanks identified as having leaked or potentially leaking.	0	0	0	0
Solid Waste/Landfill Facilities: State list of sites that currently or previously accepted waste of any kind for disposal on site.	0	0	0	0

For Improved Properties, the local fire department, County environmental health department, or other appropriate local agency should be contacted to determine whether the property is currently or historically known to store or contain hazardous materials, or to have an underground storage tank. Note: residential underground storage tanks are not listed with government agencies. Please indicate the results of the local agency research below, and attach NPS Contact Record(s), as appropriate.

D.2 Historical Uses Inquiry

Historical Sources: At least one source dating back to 1940 should be used. If reasonably ascertainable, sources should be examined in the following order of preference. Please check which source(s) were used.

Improved Properties		Unimproved Properties	
X	1. Aerial Photographs	_____	1. Aerial Photographs
X	2. Topographic Maps	_____	2. Topographic Map
_____	3. Sanborn Fire Insurance Maps		
_____	4. Local Building Department Records		
_____	5. Local Fire Department Records		

Based upon a review of historical sources (see description above), identify the past land use(s) of the property and adjacent properties, dating back to at least 1940, as available. Please indicate the years for each past land use, and the sources used.

Subject Property
1700s to early- to mid-1900s: Part of a plantation used for growing cotton and indigo, and/or cattle farming. (Source: Interviews.)

1947 to 1950s: Undeveloped woods, cleared land and beaches. (Sources: Interviews, historical aerial photographs and topographic map.)

1950s to Present: Undeveloped woods, beaches, resort, marina and residential areas. (Sources: Interviews, historical aerial photographs and topographic map.)

Adjacent Properties
1947 to Present: Undeveloped wooded land and water bodies (Caneel Bay, Turtle Bay, Hawksnest Bay) and a road (Highway 20). (Sources: Historical aerial photographs and topographic map.)

Following is a list of additional potential sources to consider for research into the historical land use of the property and background information of the area. Please check the box to the left of any additional sources utilized in conducting this Level I Survey and include contact records and/or letters as attachments.

Table D-2

	City/County Directories		Property Tax Files		Personal Familiarity		Past Environmental Surveys/Real Estate Appraisals
	Appraisal Report		Title Reports		Previous Owner		Military Records
	Old Newspapers		BLM Master Title Plats/Records	X	Current Owner Representative	X	EPA Enviromapper System
	Park Historian		Mine Claim Records		Current Tenants	X	Other: Electronic search of environmental records conducted by Environmental Data Resources, Inc.
	Past Site Utility Providers		Tract Map/ Land Status Map/ Segment Map	X	Park Personnel including Cultural Resources Staff		Environmental Protection Agency (EPA) Personnel
	Conservation Society		Zoning/Land Use Records		Nearby Businesses & Neighbors	X	Local Fire Department

E. Interviews

Please indicate the name(s) of the people interviewed, the date(s) on which the interviews took place, and the type of information provided from each person. Please provide this information for all persons interviewed, regardless of the usefulness of information provided. In addition, for each contact, please include NPS Contact Records as an attachment.

Name of Interviewee	Relationship to Property	Date of Interview	Information Provided
Nicoli Holtz & Alvin Nazario	Property Owner Representatives	5/22/12	Information regarding historical use and any environmental conditions or structures on or near the tract.
	Former Property Owner		
	Current Tenant		
Rafe Boulon & Mark Hardgrove	Park Personnel	5/22/12	Information regarding historical use and any environmental conditions or structures on or near the tract.
	Park Personnel		
	EPA Personnel		
	EPA Personnel		
	State Environmental Agency Personnel		
	County Environmental Health Department		
Albert Francis	Saint John Fire Department	6/5/12	Information regarding any hazardous material or petroleum product spills on or near the tract.

F. Recommendations

Discuss whether a Level II or III Survey will be recommended. If an item is checked "Yes" or "Unk" in Sections B or C, or if any of the records research in Section D identified a past land use of potential concern or a site with a regulatory listing of potential concern, and further investigation is warranted, please indicate this by listing those items under the appropriate recommendation. If an item is checked "Yes" or "Unk" in Sections B or C and no further investigation is recommended, please indicate the reasons for the conclusion that no further inquiry is warranted.

NOTE: A Level II Survey involves further research or investigation into a specific item(s) identified as a concern in the Level I Survey, including a quantitative investigation in which testing is performed to determine the nature and extent of potential or known contamination of soil, groundwater, surface water, or air. A Level III Survey involves the design of cleanup measures, and the cleanup of known contamination.

Table F-1

	Recommendation	Pertinent Items Leading to Recommendation
	No further studies are recommended.	
X	A Level II Survey is recommended.	Numerous recognized environmental conditions were identified in connection with the subject property.
	A Level III Survey is recommended.	

G. List of Attachments

Please check all that apply.

Check if Included	Attachments
X	Site Location Map (Identify Off-Site Areas of Concern)
X	Site Layout Map (Identify On-Site Areas of Concern)
X	Aerial Photographs & Topographic Map
X	Contact Records
	Soil Assessment Report
	Asbestos-Containing Materials Report
	Lead-Based Paint Report
	Site Inspection Report
	Appraisal Report
X	Survey Maps
	Other (please identify)
	Other (please identify)
	Other (please identify)

H. Certifications

1. Preparer's Certification and Environmental Professional Declaration

I certify that I have made a reasonable effort to perform a technically accurate and comprehensive evaluation during the completion of this Level I Survey. In addition, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR 312.10(b) and ASTM 1527-05. I have the specific qualifications based on education, training and experience to assess a property to evaluate the nature, history, and setting of the subject property.

Signed John D. Barksdale Print Name John D. Barksdale, P.G.

Date 9/4/12 Title B & A Project Manager
Professional Geologist

2. SSO Hazardous Materials Coordinator Review

I certify that I have reviewed this Level I Survey and have determined that the survey is complete and accurate to the best of my ability, I am qualified to perform this review, concur with the recommendation(s), and recommend approval by the Regional Director.

Signed _____ Print Name _____

Date _____ Title _____

3. Regional Director Approval

I hereby approve this Level I Survey and all of the above conclusions and recommendations.

Signed _____ Print Name _____

Date _____ Region _____

NPS Contact Record		
To: Jim Strotman	Date: 5/22/12	Time: 0900
From: John Barksdale (B & A)	Tract Number: Various	
Contact Name: Rafe Boulon & Mark Hardgrove	Property Name: Caneel Bay Resort	
Agency/Company: Virgin Islands National Park (VIIS)	Phone Number: 340-776-6201 (ext. 224 [Rafe])	
Regarding: Environmental Condition & History of Subject and Adjacent Tracts		

Rafe is the Chief of the VIIS Resource Management Division on Saint John. He has lived on Saint John for most of the last 40 years and is very familiar with the subject tract area. Mark is the Superintendent of VIIS; he has worked with the NPS for nearly 42 years, including the last five years on St. John. The following information was provided during a meeting with Rafe and Mark.

The resort property land is owned by the NPS (since 1956); however, the buildings and facilities are still owned and operated by a private group. The resort has been operating since the 1950s. The resort is currently operated and managed by Rosewood Hotels and Resorts, which also conducts marketing and reservations. The Caneel Bay Resort (CBR) has been operating at this location for decades. Potential environmental issues are known to exist at the fuel tank farm for the emergency generators, in the maintenance (engineering) area, at the marina facility, and at an old tank farm near the marina. Sewage sludge from the wastewater treatment plant has been reported to have been taken every 10 years to an "organic landfill" near Honeymoon Beach. An oil sheen is periodically observed on the water at the marina. A written report was believed to exist for a fuel spill cleanup at the emergency generator tank farm on the main resort property; however, the report could not be located.

Rafe accompanied B & A on the first day of the site inspection. While at the CBR marina, Rafe said that the marina was previously used as a place to haul out boats and do bottom repairs and bottom re-painting.

Rafe said that prior to the 1950s, the property was part of a large plantation which grew crops and raised cattle; although he knew of no cattle dip vats on the property or other adverse impacts from the plantation. Plantation activities on the island began in the 1700s. There are a number of large historic stone structures (ruins) on the property. He also reviewed the environmental sites listed in the EDR Zip Report and identified the listed sites that were within 1 mile of the property. He believed that none of the listed sites that were off the subject property were likely to be an environmental concern to the property.

NPS Contact Record		
To: Jim Strotman	Date: 5/22/12	Time: 1200
From: John Barksdale (B & A)	Tract Number: Various	
Contact Name: Nicolay Hotze and Alvin Nazario	Property Name: Caneel Bay Resort	
Agency/Company: Rosewood Hotels & Resorts	Phone Number: 340-244-0912 (Nicolay) & 340-690-2003 (Alvin)	
Regarding: Ownership, History and Environmental Issues of the Subject Property		

Nicolay & Alvin are with Rosewood Hotels & Resorts which manages the Caneel Bay Resort (CBR); they both work at the resort property. Nicolay is the general manager and Alvin is the director of facilities.

Nicolay said that CBR is owned by CBI Acquisitions, which is in the northeast United States. CBR is managed by Rosewood Hotels and Resorts, which is located in Texas. Rosewood handles all the operations, management, bookkeeping and reservations for CBR. CBR has material data safety sheets (MSDSs) on-site for all the hazardous materials they use. CBR had an OSHA inspection a few weeks ago and no big problems were identified. Nicolay was unaware of any unresolved environmental issues or problems on the property.

Correspondence with Alvin Nazario was accomplished via several emails in July and August of 2012. Specifically, Alvin was asked about the purpose of the monitoring well observed in the engineering area. He said that the well was installed in the 1990s when several fuel underground storage tanks (USTs) were removed from that area. He said that no groundwater contamination was detected in the well. He also said that he did not have a copy of the report on the removal of fuel contaminated soil a few years ago from the tank farm near the emergency generator building.

NPS Contact Record		
To: Jim Strotman	Date: 6/5/12	Time: 1200
From: John Barksdale (B & A)	Tract Number: Various	
Contact Name: Albert Francis	Property Name: Caneel Bay Resort	
Agency/Company: Saint John Fire Department	Phone Number: 340-776-6333	
Regarding: Hazardous Materials or Petroleum Product Spill Sites on or Near the Subject Property		
Albert is with the Saint John Fire Department located in Cruz Bay on Saint John. He said he knew of no hazardous material or petroleum product spills or other environmental sites on or near the subject property.		

U.S. Department of the Interior
NATIONAL PARK SERVICE
Virgin Islands National Park

Level II Environmental Site Assessment Report
Caneel Bay Resort
Saint John, U.S. Virgins Islands

March 5, 2014

Prepared By:

Barksdale & Associates, Inc.

Environmental & Industrial Hygiene Services

105 South G Street

Pensacola, Florida 32502

TABLE OF CONTENTS

EXECUTIVE SUMMARY

This document is the *Level II Environmental Site Assessment (ESA) Report for the Caneel Bay Resort (CBR) Property.* The CBR property is located on the west part of the island of St. John, U.S. Virgin Islands, in the Virgin Islands National Park (VIIS). The CBR property consists of a 150-acre vacation resort located approximately 1 mile northeast of the town of Cruz Bay.

This Level II ESA is the result of a Level I ESA that was completed for the property in September of 2012. The Level I ESA identified a number of recognizable environmental conditions (RECs) on the CBR property. The purpose of this current assessment was to conduct specific Level II activities at each of the REC site areas in order to determine if an actual release of hazardous substances or petroleum products has occurred.

The results of this assessment indicate that a release of hazardous substances or petroleum products has occurred at all seven sites investigated for this Level II ESA. Additional Level II assessment activities are recommended.

Specific recommendations for each site and other areas are provided in Section 4 of this report.

1.0 INTRODUCTION

This document is the *Level II Environmental Site Assessment (ESA) Report for the Caneel Bay Resort (CBR) Property*. The CBR property is located on the west part of the island of St. John, U.S. Virgin Islands, in the Virgin Islands National Park (VIIS). The entire CBR property consists of approximately 150 acres. The property is located approximately 1 mile northeast of the town of Cruz Bay. The property consists of a large vacation resort with approximately 100 buildings and structures used for lodging, food services, recreation, docks, marinas and maintenance services. The resort property is adjacent to the east side of Caneel Bay and also includes several beaches and large areas of undeveloped woods. The National Park Service (NPS) currently owns the land but proposes to acquire ownership of the buildings and structures.

This Level II ESA is the result of a Level I ESA that was completed for the property in September of 2012. The Level I ESA identified a number of recognizable environmental conditions (RECs) on the CBR property. The purpose of this current assessment was to conduct specific Level II activities at each of the REC site areas in order to determine if an actual release of hazardous substances or petroleum products has occurred. Additional site information concerning the RECs and sites is presented in the Level I ESA report.

2.0 METHODOLOGY

This Level II ESA was conducted in accordance with the *Workplan for Level II Environmental Site Assessment (ESA) of the Caneel Bay Resort (CBR) Property, July 1, 2013*, with the following exceptions:

- The proposed work at the existing marina and fuel facility, and at the former marina fuel tanks was deleted at the request of the NPS.
- Analysis for pesticides and herbicides was added to three of the sediment samples collected at the engineering and maintenance area based on observations made during the fieldwork for this Level II ESA.
- Two subsurface soil samples and analyses were deleted from the engineering area former underground storage tank (UST). This was due to the presence of abundant rocks in the subsurface which prevented the installation of two of the soil borings to the water table.

2.1 Fieldwork and Sampling

The fieldwork and sampling activities for this Level II ESA were conducted from January 11 to January 17, 2014 by John D. Barksdale and Rafe Boulon of Barksdale and Associates, Inc. (B & A). The fieldwork and sampling activities were conducted in general accordance with the Field Branches Quality System and Technical Procedures, U.S. Environmental Protection Agency (EPA), Region 4 (http://www.epa.gov/region4/sesd/fbqstp/#GuidanceDocuments).

Continuous soil cuttings were collected from the soil borings and soil sample locations. The lithologic and hydrogeologic properties of the soil were recorded. The soil cuttings were field-screened for the presence of volatile organic vapors (e.g., petroleum or solvents) using a calibrated photo-ionization detector (PID). In addition, the soil cuttings were observed for indications of potential contamination, including staining, sheen and odors. The results of the field screening were used to determine the locations and/or depth intervals of the samples, unless otherwise specified in this report. All samples were collected from locations and/or depth intervals most likely to exhibit contamination.

After collection, the samples were placed on ice in coolers and shipped via overnight delivery to Test America in Pensacola, Florida for laboratory analyisis.

2.2 Laboratory Data Interpretation

The soil, sediment and groundwater sample analytical results were compared with the site screening levels found in the U.S. Environmental Protection Agency (EPA) Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013 (http://www.epa.gov/region9/superfund/prg/). The RSLs are conservative risk-based human health site screening criteria developed by EPA. Four RSLs were selected as screening criteria for the site samples, as follows:

- Residential Soil RSLs – These screening criteria are used to evaluate direct human

exposure to soils in an outdoor residential setting.

- Industrial Soil RSLs - These screening criteria are used to evaluate direct human exposure to soils for workers in an outdoor industrial or commercial setting.
- SSL RSLs – These screening criteria are used to evaluate the potential of the target compound to leach from the soil and migrate to the groundwater at levels of concern. SSLs are back-calculated from acceptable ground water concentrations.
- Tapwater RSLs – These screening criteria were used for evaluating significance of target compounds in the groundwater.

The soil and sediment results were also compared with ecological screening values for sediment found in *Supplemental Guidance to RAGS: Region 4 Bulletins, Ecological Risk Assessment* (EPA 2001) (http://www.epa.gov/region4/superfund/programs/riskassess/ecolbul.html). These screening criteria assess the impact of the target compounds on non-human biological organisms.

The U.S. Virgin Islands Department of Planning and Natural Resources (DPNR) has soil cleanup standards for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PAHs). DPNR also uses the EPA RSLs as soil and groundwater screening criteria. The soil and groundwater results for this assessment were compared to the DPNR standards and screening criteria.

Metals concentrations in the soils were also compared to naturally occurring levels of metals known to present in shallow soils in the continental United States. Background levels of metal in soils are presented in the document: *Geochemical Landscape of the Conterminous United States – New Map Presentations for 22 Elements,* U.S. Geological Survey (USGS) Professional Paper 1648, November 2001. USGS-derived arithmetic mean (average) metals values were used to evaluate whether the metals concentrations detected in the site soils were representative of naturally occurring background conditions or were indicative of anthropogenic sources of contamination. The average background metals values used were as follows:

- Arsenic - 5.2 milligrams per kilogram (mg/kg)
- Barium - 440 mg/kg
- Chromium - 37 mg/kg
- Lead - 16 mg/kg
- Selenium - 0.26 mg/kg
- Mercury - 0.058 mg/kg

Metals concentrations detected on the sites that exceeded 1.5 times the USGS background values were considered to potentially be anthropogenic sources of contamination. USGS background values were not available for the metals silver and cadmium.

A soil sample was collected by B & A on Saint John in 2009 in a non-affected area. The sample was analyzed for arsenic and the result was 8 mg/kg. This concentration is similar to the above background concentration for arsenic reported by the USGS.

2.3 Laboratory Analytical Methods

The following are the laboratory analytical methods used for this assessment:

- Total petroleum hydrocarbons (TPH) diesel range organics (DRO), gasoline range organics (GRO) and oil range organics (ORO; EPA Method 8015C).
- Semi-volatile organic compounds (SVOCs; EPA Method 8270D).
- Benzene, toluene, ethylbenzene and total xylenes (BTEX; EPA Method 8260B).
- Polychlorinated biphenyls (PCBs; EPA Method 8082A).
- Organochlorine pesticides (EPA Method 8081B).
- Organophosphorous pesticides (EPA Method 8141A).
- Herbicides (EPA Method 8151A).
- Nitrogen nitrate-nitrite (Method 9056).
- Nitrogen nitrite (Method 9056).
- Resource Conservation and Recovery Act (RCRA) metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver) (EPA Methods 6010C and 7471B).

2.4 Field Quality Assurance/Quality Control (QA/QC) Samples

Limited numbers of field QA/QC samples were collected. These consisted of two field duplicate samples, an equipment rinsate sample and one trip blank sample. The duplicate samples consisted of splits of soil samples collected from the engineering area underground storage tank site and the debris landfill site. The equipment rinsate sample consisted of laboratory-grade analyte-free water poured over decontaminated soil sampling equipment and analyzed for TPH DRO and GRO; BTEX; SVOCs; PCBs; and RCRA metals. The trip blank was analyte-free water shipped with samples being analyzed for BTEX; the trip blank was analyzed for BTEX only.

2.5 Subsurface Utilities

Where soil borings were conducted below 1 foot, the locations of existing subsurface utilities were determined prior to conducting these activities. Soil borings deeper than 1 foot were conducted only at the engineering area former UST site. CBR staff indicated that there were no subsurface utilities near the proposed soil boring locations at the former UST site.

2.6 List of Sites Investigated and Samples Collected

The following is a list of the sites investigated and the samples and analytical parameters for each site.

Table 1: List of Sites & Samples Collected

Site Number & Name	Number of Samples			Analytical Parameters
	Soil	Sediment	Groundwater	
01 - Engineering & Maintenance	6	1		TPH DRO, GRO & ORO; SVOCs; PCBs; RCRA metals
01 - Engineering & Maintenance		3		TPH DRO, GRO & ORO; SVOCs; PCBs; RCRA metals; Organochlorine pesticides; Organophosphorous pesticides; Herbicides
02 - Engineering - Former UST	2		1	BTEX; SVOCs; lead
03 - Grounds & Landscaping – Chemical Storage Sheds	6			Organochlorine pesticides; Organophosphorous pesticides; Herbicides; Nitrogen nitrate-nitrite; Nitrogen nitrite; RCRA metals
04 - Grounds & Landscaping – Equipment Maintenance Building	2			TPH GRO and ORO; SVOCs; RCRA metals
05 - Emergency Generator Building	4			TPH DRO and ORO; SVOCs; RCRA metals
06 - Wastewater Treatment Plant	3			TPH ORO; SVOCs; PCBs; RCRA metals
07 - Debris Landfill Near Honeymoon Beach	4			SVOCs; PCBs; Organochlorine pesticides; Organophosphorous pesticides; Herbicides; RCRA metals

(See also Table 2 in Appendix C)

2.7 Soil Sample Collection

The soil samples were collected manually using decontaminated steel post-hole diggers and/or a stainless steel trowel. A decontaminated stainless steel hand auger was also used to collect the subsurface soil samples. The sediment samples were collected using only the decontaminated stainless steel trowel.

3.0 RESULTS

This section discusses the results of the fieldwork and sampling activities for each site. Maps showing each site and the sample locations are provided in Appendix A (Figures 1 to 9). Photographs taken during the assessment fieldwork are provided in Appendix B. Appendix C contains results summary tables. Table 2 in Appendix C presents a list of all the soil and water samples, sample numbers and sample depths; Table 2 also lists the rationale for the location of each sample and the indications of potential contamination observed for the samples. Tables 3 through 10 in Appendix C provide a summary of the laboratory analytical results for each sample; the tables also provide the screening criteria discussed above in Section 2.2 and indicate whether the sample results exceeded the screening criteria. The laboratory analytical reports for the samples are contained in Appendix D.

Figure 1 in Appendix A shows the general location of each of the sites on the CBR facility.

A discussion of the assessment results for each site is provided below in Sections 3.1 to 3.7.

3.1 Site 1 – Engineering and Maintenance Area

Figures 2 and 3 show the locations of the six surface soil and four sediment samples collected for the site. Nearly all the engineering and maintenance area is paved with concrete. The surface soil samples were collected at the edges of the pavement where runoff discharges to bare soil. The sediment samples were collected from deposits of sediment in the concrete paved drainage ditch down slope from the site.

As shown in Table 2, none of the Site 1 surface soils or sediment exhibited indications of potential contamination in the field.

As shown in Table 3, three of the surface soil samples exceeded RSL or DPNR screening criteria for SVOCs and/or TPH DRO. Three samples exceeded screening criteria and 1.5 times background for arsenic. One sample exceeded screening criteria and 1.5 times background for mercury. The majority of the screening criteria exceedances were located in the area north of the engineering and maintenance area where stormwater surface runoff flows from the concrete paved areas to bare soil.

As shown in Table 4, three sediment samples exceeded RSL screening criteria for SVOCs and/or organochlorine pesticides. Two samples exceeded ecological screening values for organochlorine pesticides. One sample exceeded RSL screening criteria and 1.5 times background for mercury. There were no exceedances in sediment sample 01-SD-04, which was collected where the drainage ditch discharges to the beach on the west shore of Caneel Bay.

3.2 Site 2 – Engineering Area Former UST

Figure 4 shows the locations of the soil borings, monitoring well, and soil and groundwater samples collected on the site.

The former UST had been previously reported by CBR management staff to have been removed in the mid-1990s. During the current site investigation fieldwork, a CBR employee (Lynne Norman), who was present when the tank was removed, confirmed that the UST was removed and verified that the former tank was located just south of a warehouse building in the engineering area (see Figure 4). The location of the former UST was evident by a patched area in the concrete pavement measuring approximately 9 feet wide and 38 feet long.

A monitoring well was observed to be located near the southwest corner of the former UST location. The monitoring well was accessed through a flush-mounted steel manhole with a bolt-down lid. The well was measured to be 7.5 feet deep and is constructed of four-inch-diameter continuous polyvinyl chloride (PVC) screen. The static water level in the well was approximately 5.3 feet below the ground surface (BGS). One well volume of groundwater was calculated to be approximately 1.5 gallons. On the day prior to sampling, the well was purged of approximately 9.5 gallons of water (approximately 6 well volumes). The groundwater rapidly flowed back into the well and was clear and virtually sediment-free. No sediment was observed to remain in the bottom of the well. Based on these results, the well was determined to be suitable for collecting a representative groundwater sample. On the day of sampling (1/12/14), the well was purged of 5 gallons of water just prior to sampling. The groundwater sample was collected using a disposable, two-inch diameter Teflon bailer. During purging and sampling, care was taken to minimize agitation of the groundwater in the well.

Based on the topography at the site and surrounding area, the direction of shallow groundwater flow near the UST is estimated to be to the west. Therefore the monitoring well at the site appears to be downgradient of the former UST location.

Attempts were made at seven locations to install soil borings at the former UST site. Due to the presence of numerous rocks in the subsurface soil, only two boreholes were able to be advanced to the depth of the water table (see Figure 4). The depths of the unsuccessful boreholes ranged from approximately 1 to 3 feet BGS. The two successful boreholes were installed to approximately 7.5 feet BGS; the water table in the boreholes appeared to be at approximately 5 to 6 feet BGS. Both successful boreholes were believed to have been installed in the former UST excavation, based on the observed presence of suspected fill material. The soil near the water table in the two boreholes had a slight petroleum odor. No other indication of potential petroleum contamination was observed in the soil. Based on the field observations and locations of the two successful boreholes, it is believed that these two boreholes adequately represent the subsurface conditions at the former UST location. The concrete surface at all seven borehole locations was patched with concrete following the borehole installations or attempts.

As discussed above and shown in Table 2, the subsurface soil samples had a slight petroleum odor. However, the groundwater sample had a strong petroleum odor. The groundwater was screened with a photoionization detector (PID) using a one-gallon plastic bottle half-filled with groundwater. The PID reading of the air (headspace) in the bottle was 3.3 parts per million (ppm), which indicates the presence of volatile organic compounds (VOCs) in the groundwater. As a control, the same test was performed using tapwater and the resulting PID reading was 0.1 ppm.

As shown on Table 5, none of the subsurface soil samples exceeded screening criteria. As shown on Table 6, the groundwater sample exceeded screening criteria for benzene, ethylbenzene, naphthalene, and 1- and 2-methylnaphhalene.

3.3 Site 3 – Grounds and Landscaping Chemical Storage Sheds

Figure 5 shows the locations of the surface soil samples collected on the site.

As shown in Table 2, none of the Site 3 surface soils exhibited indications of potential contamination in the field.

As shown in Table 7, all but one of the surface soil samples exceeded screening criteria for organophosphorous or organochlorine pesticides. Five of the samples exceeded screening criteria and 1.5 times background for the metals arsenic or selenium; silver exceeded screening criteria in two samples.

3.4 Site 4 - Grounds and Landscaping Equipment Maintenance Building

Figure 6 shows the locations of the surface soil samples collected on the site.

As shown in Table 2, only one of the Site 4 surface soils exhibited indications of potential contamination in the field; this was a gray staining, oil and metallic odor and PID reading up to 2 ppm.

As shown in Table 8, one surface soil sample exceeded RSL screening criteria for benzo(b)fluoranthene. One sample exceeded screening criteria and 1.5 times background for selenium.

3.5 Site 5 – Emergency Generator Building

Figure 7 shows the locations of the surface soil samples collected on the site.

As shown in Table 2, none of the Site 5 surface soils exhibited indications of potential contamination in the field.

As shown in Table 9, three of the four surface soil samples exceeded the DPNR screening criteria for DRO. All four samples greatly exceeded the screening criteria and 1.5 times background for arsenic; one sample exceeded screening criteria and 1.5 times background for selenium, and one sample exceeded screening criteria and 1.5 times background for mercury.

3.6 Site 6 – Wastewater Treatment Plant

Figure 8 shows the locations of the surface soil samples collected on the site.

As shown in Table 2, one of the Site 6 surface soil samples exhibited indications of potential contamination in the field; this was a strong oil odor.

As shown in Table 10, two of the three surface soil samples exceeded RSL screening criteria for SVOCs. Two samples exceeded screening criteria and 1.5 times background for selenium, and one sample exceeded screening criteria and 1.5 times background for mercury.

3.7 Site 7 – Debris Landfill

During site assessment fieldwork, CBR staff reported that the landfill has been used for over 50 years to dispose of all types of wastes from CBR operations. In addition, CBR staff reported that the deposited material is up to 15 feet thick in places, especially in the southwest part of the landfill.

Figure 9 shows the locations of the surface soil samples collected on the site.

The surface soil samples at Site 7 were collected from specific locations as opposed to the gridded locations proposed in the workplan. This was due to the results of a closer inspection of the landfill area. One sample was collected at the base of the fill material at the downslope (southwest) end of the landfill area. The other three were collected in four- to six-foot-deep depressions in the surface of the landfill where garbage and debris were exposed. All four samples were collected from two composites at each sample location.

As shown in Table 2, three of the four Site 7 surface soils exhibited indications of potential contamination in the field; this was plastic and metal debris in the soil.

As shown in Table 11, three of the four surface soil samples exceeded screening criteria for the pesticide dieldrin and for SVOCs and PCBs. Three of the samples exceeded screening criteria and 1.5 times background for the metal selenium.

3.8 Laboratory Analytical Results Discussion

Some of the sample analytical results were labelled with an "I" qualifier, which indicates that the detected concentration was low and was above the laboratory method detection limit but was below the practical quantitation limit.

Some of the sample analytical results were labelled with a "V" qualifier, which indicates that the detected analyte was also present in the associated laboratory method blank; and the concentration detected in the method blank was equal to or more than 10% of the concentration reported for the sample. This is not believed to have affected the analytical results for the samples.

A complete discussion of the laboratory quality control results is provided in the case narrative of each Test America report (Appendix D).

3.9 Field Quality Control Sample Results

Duplicate Samples

The duplicate samples consisted of splits of two soil samples collected from: 1) the engineering area underground storage tank site (sample 02-SU-03, see Table 5); and 2) the debris landfill

site (sample 07-SS-05, see Table 11). The results of both duplicate samples were in close agreement with the original samples from which the duplicates were split.

Rinsate Sample

The equipment rinsate sample consisted of laboratory-grade analyte-free water poured over decontaminated soil sampling equipment (see Table 6). Very low concentrations of DRO and mercury were detected in the rinsate blank. No other analytes (BTEX, SVOCs, GRO or lead) were detected. Given the very low concentrations of only two analytes detected, the results of the rinsate sample are considered to be acceptable and indicate that the soil sampling equipment was effectively decontaminated.

Trip Blank

The trip blank was analyte-free water shipped with samples being analyzed for BTEX; the trip blank was analyzed for BTEX only (see Table 6). No BTEX compounds were detected in the trip blank.

3.10 Asbestos Pipes

A CBR employee reported that subsurface asbestos pipes are present in several areas on the property. The pipes were reported to be part of old pipes used to supply the resort with drinking water. Asbestos pipes were reported to be present near Honeymoon Beach and the Debris Landfill (Site 7). A suspected asbestos pipe (six-inch-diameter) was observed in the subsurface near the Grounds and Landscaping Equipment Maintenance Building. Two samples of this pipe were collected to determine if the pipe material contained asbestos. The samples were analyzed for asbestos by EMSL Analytical, Inc. using Polarized Light Microscopy by EPA Method 600/R-93/116. The laboratory analytical report is contained in Appendix D. The results indicate that both samples of the pipe contained approximately 30 percent asbestos.

4.0 DISCUSSION, CONCLUSIONS & RECOMMENDATIONS

The following sections contain a discussion of the results, and conclusions and recommendations for each site. It should be noted that the groundwater beneath the CBR facility is not potable and is not used for any purpose. Some compounds were detected in the soil at levels of concern for leachability to the ground water; however, the groundwater would require sampling to determine if those compounds are actually present in the groundwater at levels of concern. Because the groundwater is unused on the property, it is unlikely that it poses a threat to human health.

4.1 Site 1 – Engineering and Maintenance Area

Soil

The screening criteria exceedances in the surface soil at this site indicate that there is a concern for direct human contact with SVOC compounds and arsenic. In addition, there are concerns for leachability of SVOCs, arsenic and mercury to groundwater. The primary area of concern on the site is the area north of the east part of the site where stormwater runoff from the maintenance areas to the soil occurs. One exceedance of the DPNR screening criteria for TPH DRO occurred in the area west and downslope from the site where stormwater runoff to bare soil occurs in that area.

Further assessment is recommended to determine the horizontal and vertical extents of the constituents in the soil at the site that exceeded screening criteria. Synthetic Precipitation Leaching Procedure (SPLP) testing of the soil should be conducted to better determine the potential for leaching of the detected constituents to the groundwater; or groundwater samples should be collected. A risk assessment may be required to better evaluate the potential risk to human health and the environment.

Sediment

The screening criteria exceedances in the sediment at this site indicate that there is a concern for direct human contact with SVOC compounds. In addition, there are concerns for leachability of 4,4-DDD, benzo(a)pyrene, benzo(b)fluoranthene and mercury to the groundwater and surface water. There is also a concern for adverse ecological impact by organochlorine pesticides. Elevated levels of these constituents were not present in the sediment sample collected on the beach where the drainage ditch discharges into Caneel Bay.

Further assessment is recommended to determine the horizontal and vertical extents of the constituents in the sediment at the site that exceeded screening criteria. SPLP testing of the sediment should be conducted to better determine the potential for leaching of the detected constituents to the groundwater and surface water; or groundwater and surface water samples should be collected. A risk assessment may be required to better evaluate the potential risk to human health and the environment.

4.2 Site 2 – Engineering Area Former UST

Subsurface Soil

Low concentrations of BTEX and SVOC compounds were detected; however, there were no screening criteria exceedances in the subsurface soil at the location of the former UST.

Groundwater

The groundwater sample exceeded the tapwater screening criteria for benzene, ethylbenzene, naphthalene, 1-methylnaphthalene and 2- methylnaphthalene, all of which are all petroleum-related compounds. These compounds are likely due to the presence of low level petroleum constituents in the soils near the former UST. However, as stated above, the groundwater is not used at the CBR facility. The concentrations of these compounds will probably decline over time due to bio-degradation and natural attenuation. Periodic re-sampling of the groundwater in the monitoring well is recommended. The manhole lid and locking cap on the well should be repaired or replaced to provide better security for the well.

4.3 Site 3 – Grounds and Landscaping Chemical Storage Sheds

The screening criteria exceedances in the surface soil at this site indicate that there are concerns for leachability of malathion, numerous organochlorine pesticides, arsenic and selenium to groundwater.

Further assessment is recommended to determine the horizontal and vertical extents of the constituents in the soil at the site that exceeded screening criteria. SPLP testing of the soil should be conducted to better determine the potential for leaching of the detected constituents to the groundwater; or groundwater samples should be collected. A risk assessment may be required to better evaluate the potential risk to human health and the environment.

4.4 Site 4 - Grounds and Landscaping Equipment Maintenance Building

The screening criteria exceedances in the surface soil at this site indicate that there are concerns for leachability of benzo(b)fluoranthene and selenium to groundwater.

Further assessment is recommended to determine the horizontal and vertical extents of the constituents in the soil at the site that exceeded screening criteria. SPLP testing of the soil should be conducted to better determine the potential for leaching of the detected constituents to the groundwater; or groundwater samples should be collected. A risk assessment may be required to better evaluate the potential risk to human health and the environment.

4.5 Site 5 – Emergency Generator Building

The screening criteria exceedances in the surface soil at this site indicate that there is a concern for direct human contact with arsenic. In addition, there are concerns for leachability of selenium and mercury to groundwater. Three of the four surface soil samples exceeded the DPNR screening criterion for DRO.

Further assessment is recommended to determine the horizontal and vertical extents of the constituents in the soil at the site that exceeded screening criteria. SPLP testing of the soil should be conducted to better determine the potential for leaching of the detected constituents to the groundwater; or groundwater samples should be collected. A risk assessment may be required to better evaluate the potential risk to human health and the environment.

4.6 Site 6 – Wastewater Treatment Plant

The screening criteria exceedances in the surface soil at this site indicate that there is a concern for direct human contact with several SVOCs. In addition, there are concerns for leachability of SVOCs, selenium and mercury to groundwater. One sample (06-SS-01) had high levels of ORO; however, there is no screening criterion for this constituent.

Further assessment is recommended to determine the horizontal and vertical extents of the constituents in the soil at the site that exceeded screening criteria. SPLP testing of the soil should be conducted to better determine the potential for leaching of the detected constituents to the groundwater; or groundwater samples should be collected. A risk assessment may be required to better evaluate the potential risk to human health and the environment.

4.7 Site 7 – Debris Landfill

The screening criteria exceedances in the surface soil at this site indicate that there is a concern for direct human contact with several SVOCs. In addition, there are concerns for leachability of alpha chlordane, dieldrin, several SVOCs, PCBs and selenium to groundwater.

Further assessment is recommended to determine the horizontal and vertical extents of the constituents in the soil at the site that exceeded screening criteria. SPLP testing of the soil should be conducted to better determine the potential for leaching of the detected constituents to the groundwater; or groundwater samples should be collected. An attempt should be made to collect soil samples from deeper within the deposited waste. A groundwater or leachate sample should be collected from just beyond the southwest part of the filled area. A risk assessment may be required to better evaluate the potential risk to human health and the environment.

4.8 Asbestos Pipes

Asbestos water pipes have been reported to be present in the ground in several areas on the CBR facility. One six-inch-diameter pipe was observed at the Grounds and Landscaping site and was tested to confirm that it contained asbestos. The observed pipe was broken and in poor condition. Asbestos is a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). An additional investigation should be conducted to identify the locations of the asbestos water pipes on the property. Where feasible, the asbestos pipes should be removed and properly disposed of to prevent human exposure to asbestos fibers. In the meantime, care should be taken not to disturb the existing pipes.

4.9 Cottage 7

A CBR employee reported that a pre-World War II bomb shelter was formerly present beneath Cottage 7, which is a guest house in the northwest part of the resort. The CBR employee believed that an underground storage tank (UST) had been associated with an emergency generator for the bomb shelter. The Cottage 7 exterior and grounds near the cottage were inspected during the fieldwork for this Level II ESA; however, no evidence of the former bomb shelter or UST was observed. More research concerning the former bomb shelter and UST should be conducted to determine if a potential release of fuel from the UST has occurred at this location.

4.10 Resort Management Practices

Many of the sites discussed in this report still have areas where hazardous substances and petroleum products are being used and are exposed to rainfall, have been spilled on surfaces, or are being discharged to the soil and water on and near the sites. CBR should clean up these areas and provide containment for the hazardous substances and petroleum products so that contaminants are no longer able to migrate to the soil or water.

Appendix A

Site & Sample Location Maps

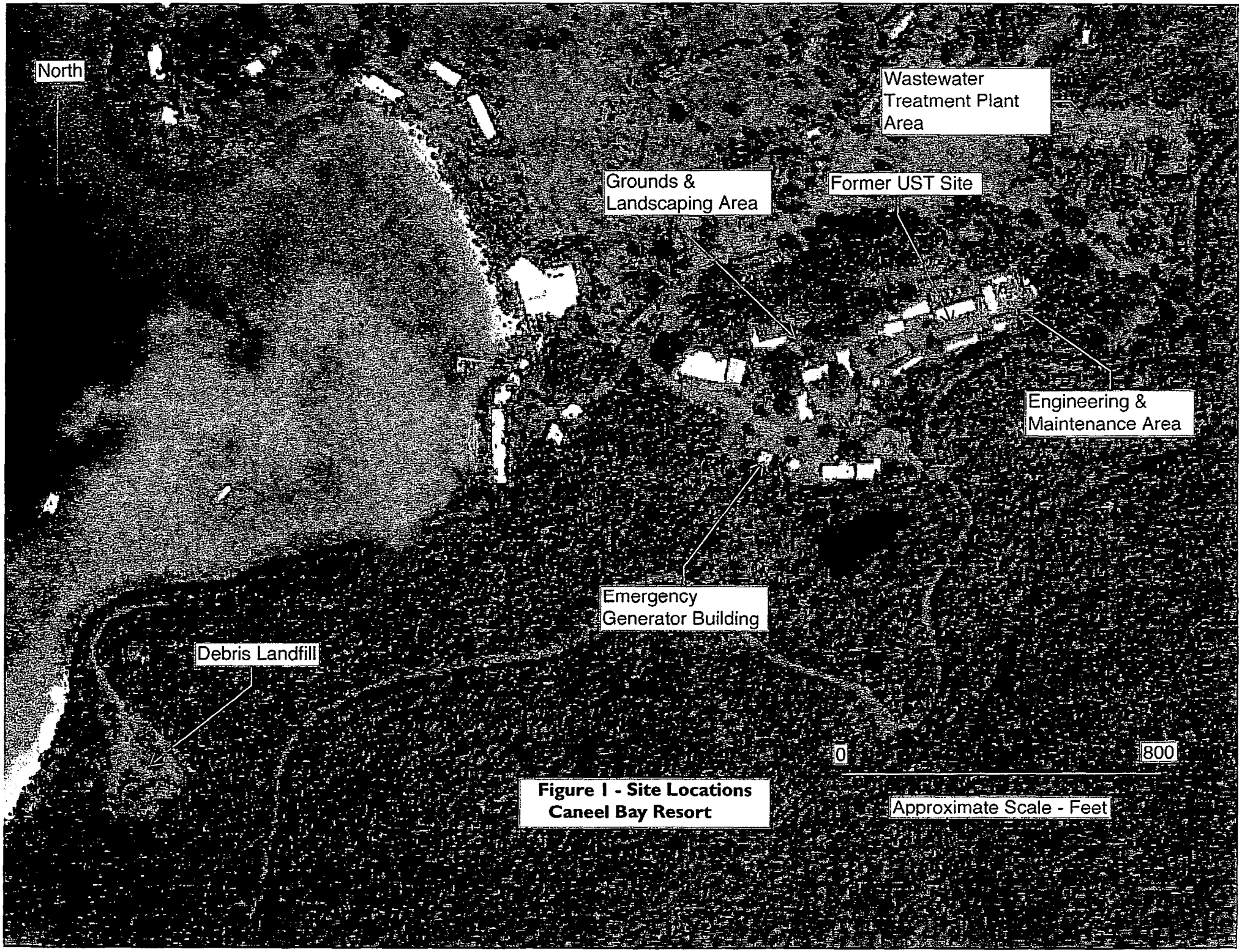


Figure 1 - Site Locations
Caneel Bay Resort

Figure 2 - Surface Soil Sample Locations
Site 1 - Engineering & Maintenance Area

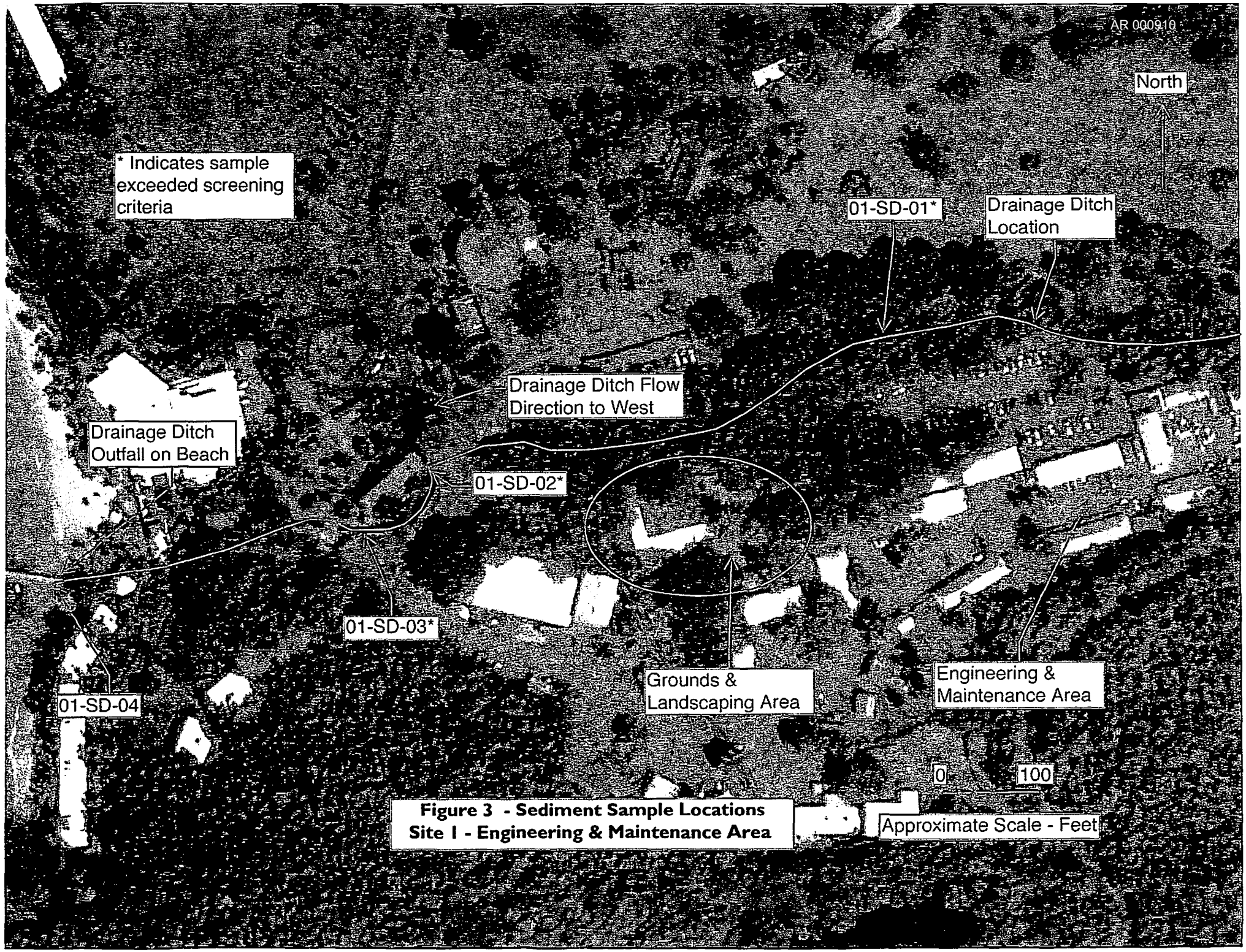


Figure 3 - Sediment Sample Locations
Site 1 - Engineering & Maintenance Area

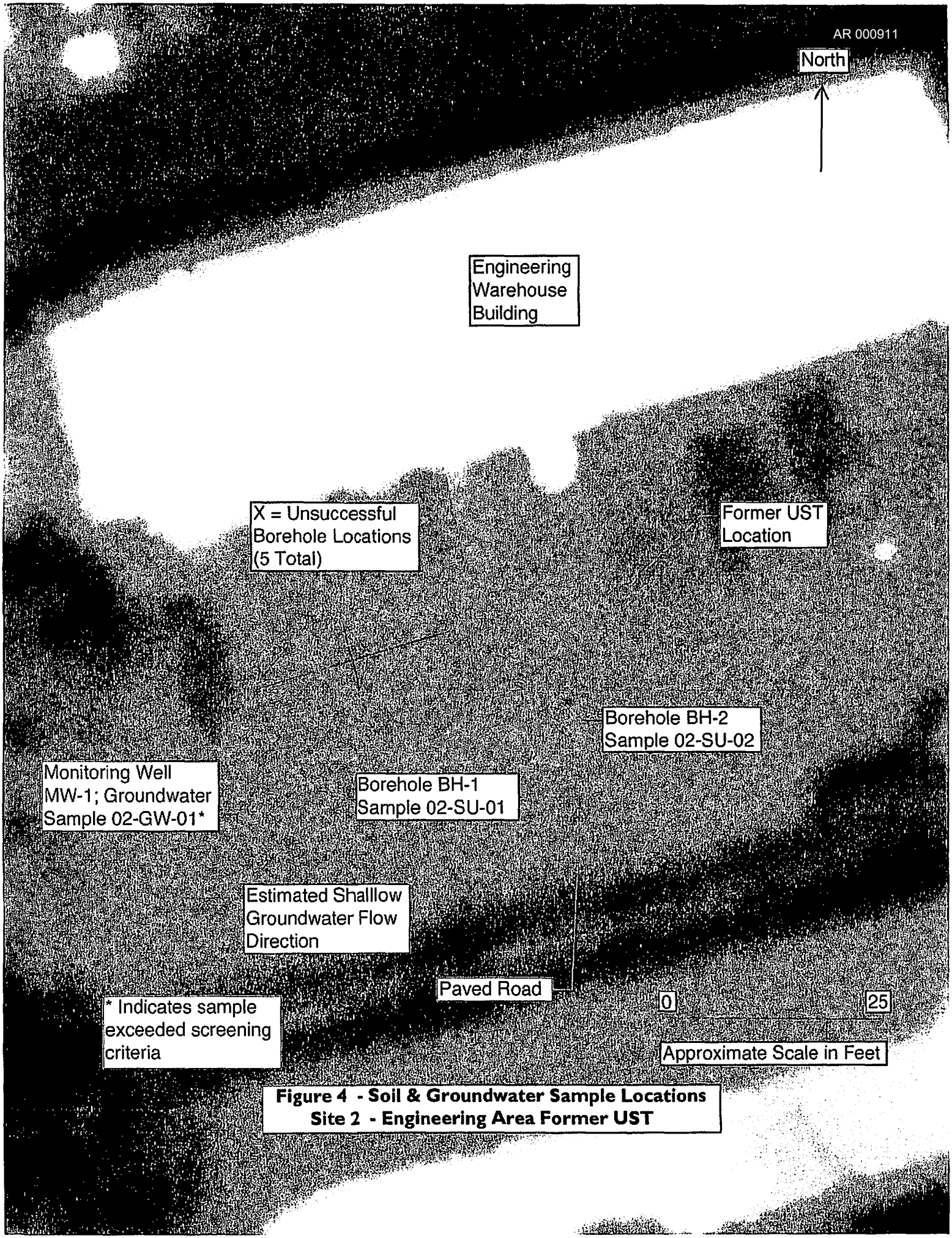


Figure 4 - Soil & Groundwater Sample Locations
Site 2 - Engineering Area Former UST

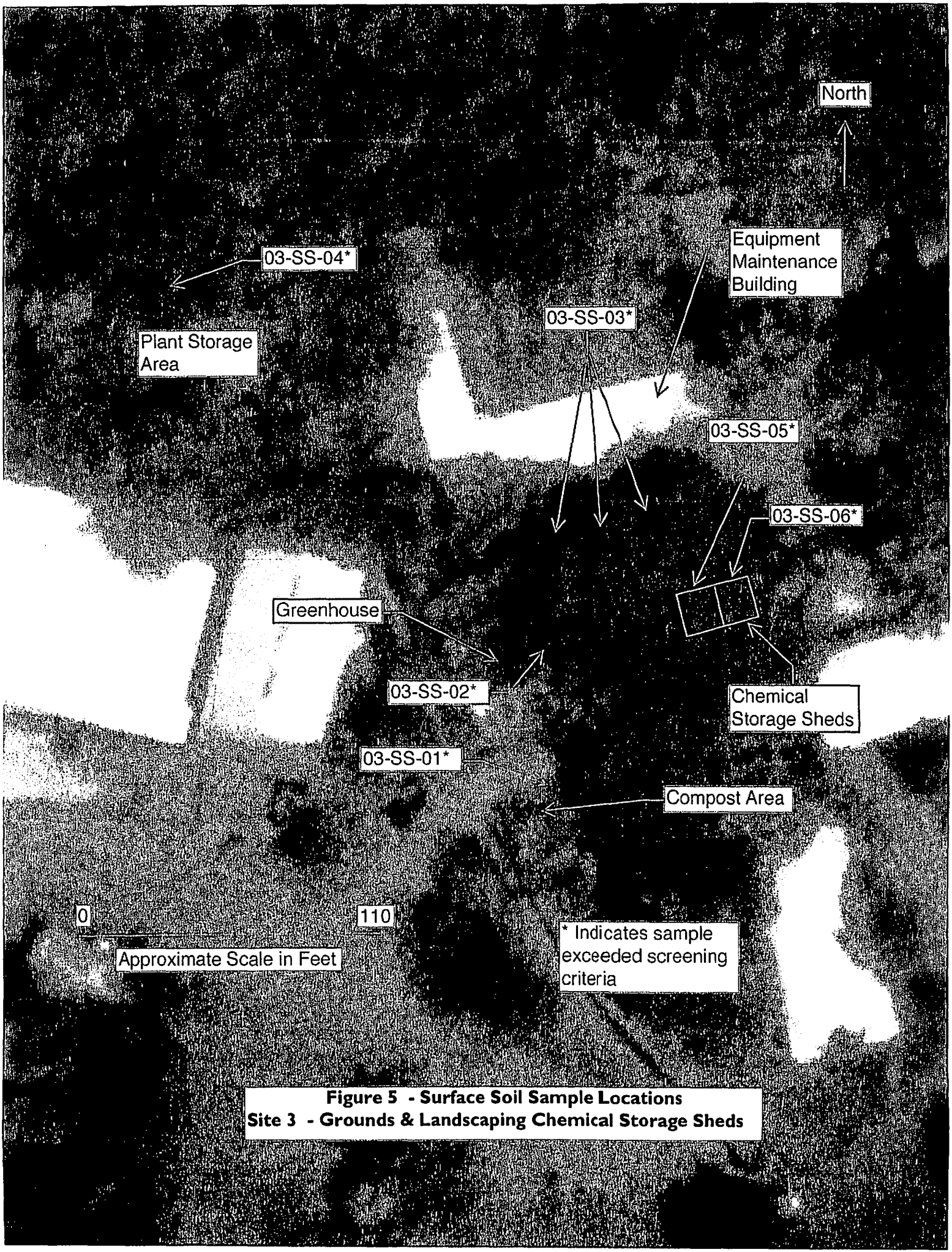


Figure 5 - Surface Soil Sample Locations
Site 3 - Grounds & Landscaping Chemical Storage Sheds

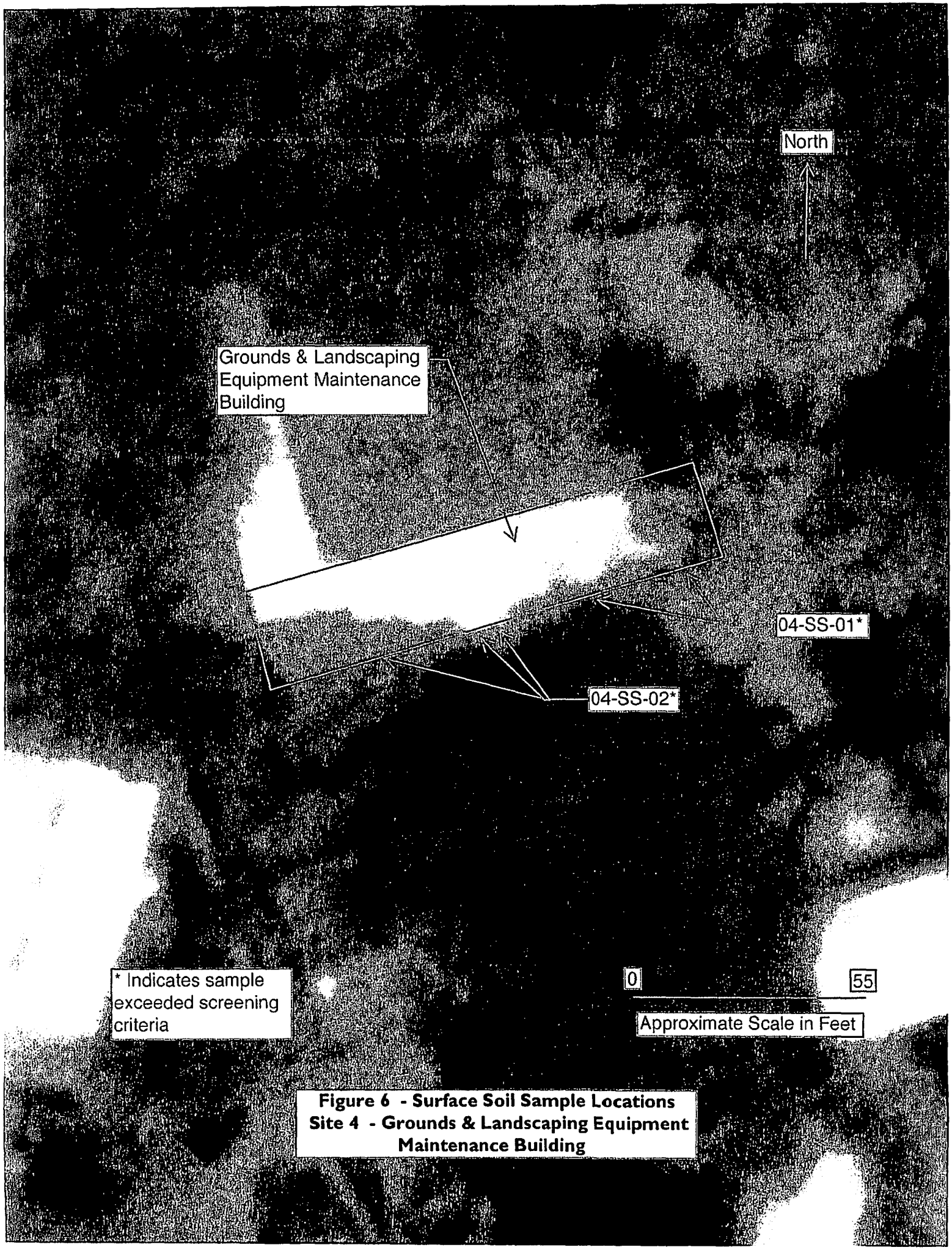


Figure 6 - Surface Soil Sample Locations
Site 4 - Grounds & Landscaping Equipment Maintenance Building

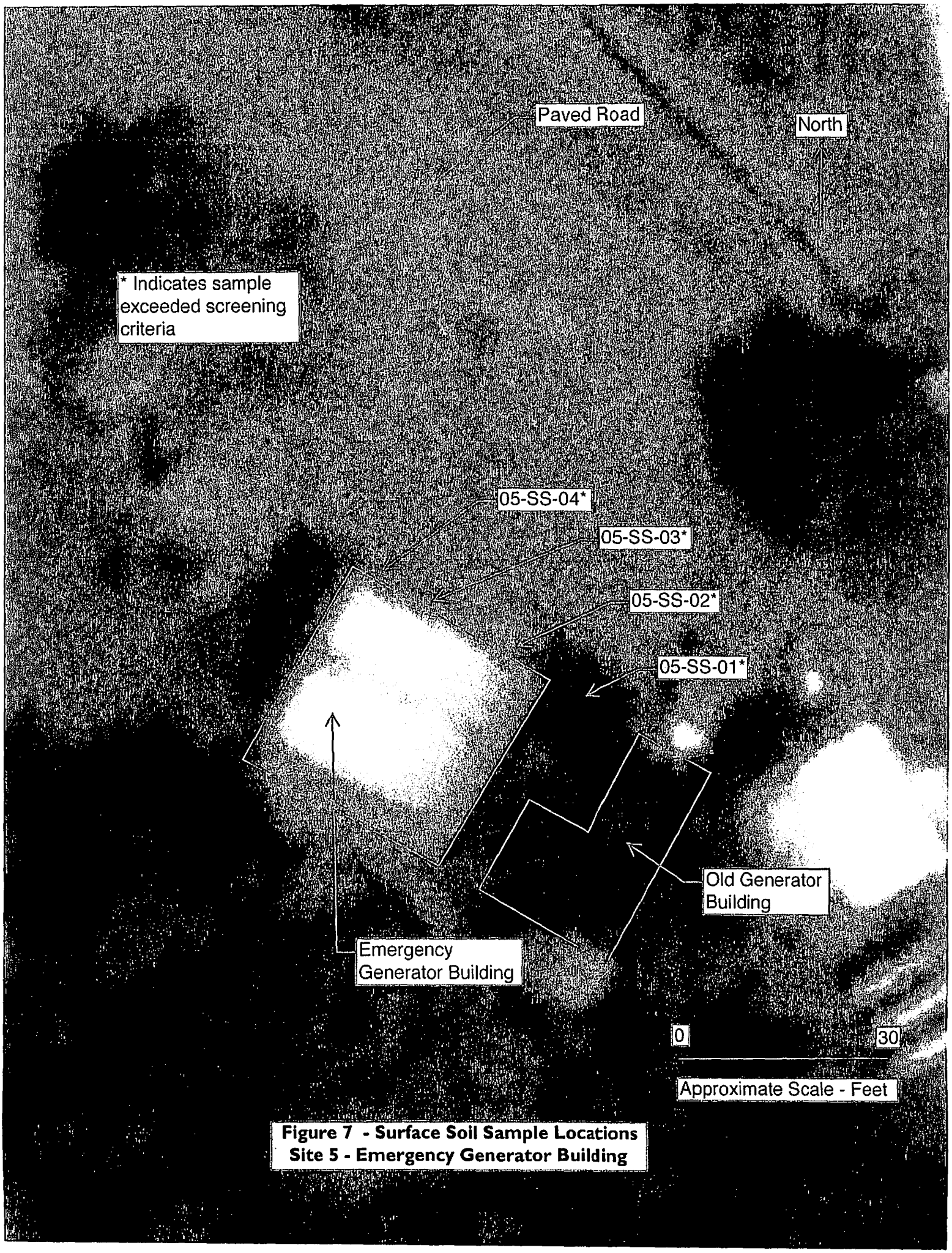


Figure 7 - Surface Soil Sample Locations
Site 5 - Emergency Generator Building

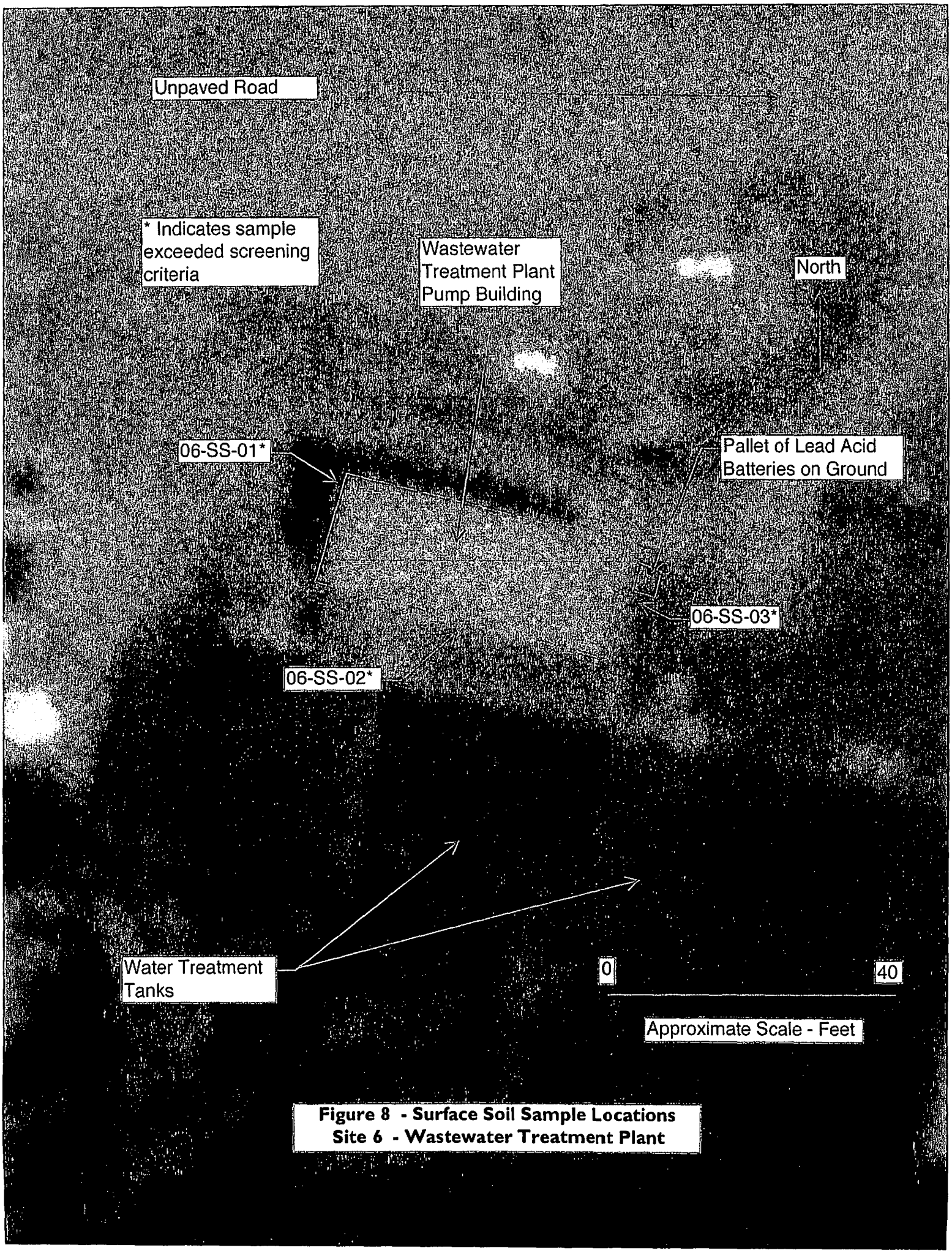


Figure 8 - Surface Soil Sample Locations
Site 6 - Wastewater Treatment Plant

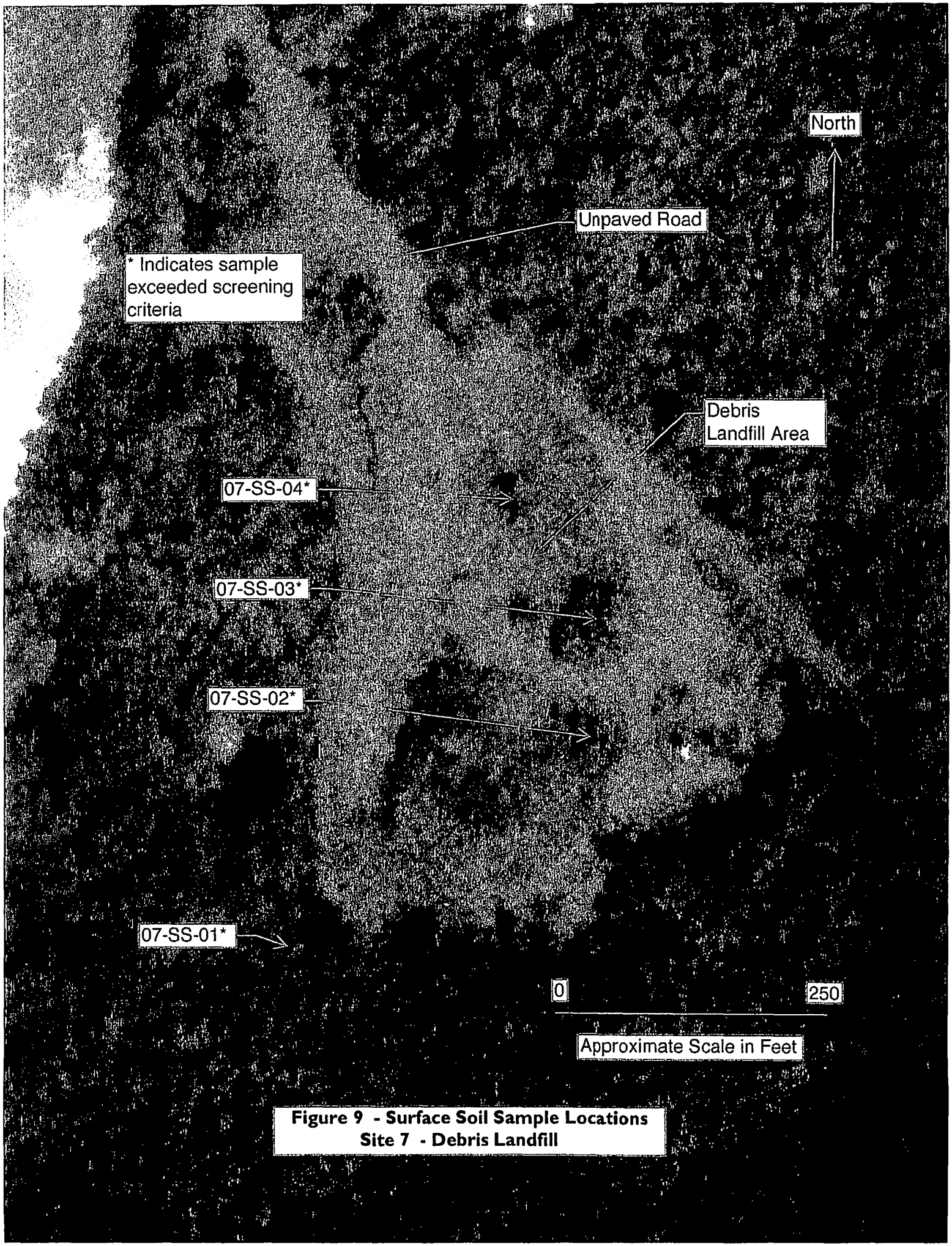
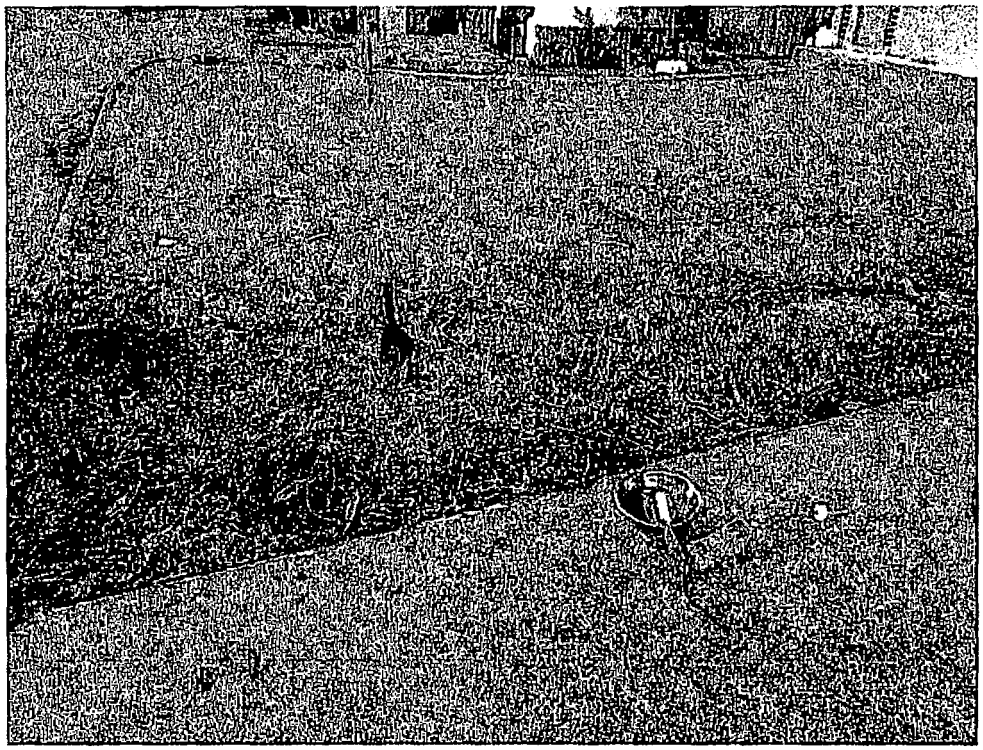


Figure 9 - Surface Soil Sample Locations
Site 7 - Debris Landfill

Appendix B

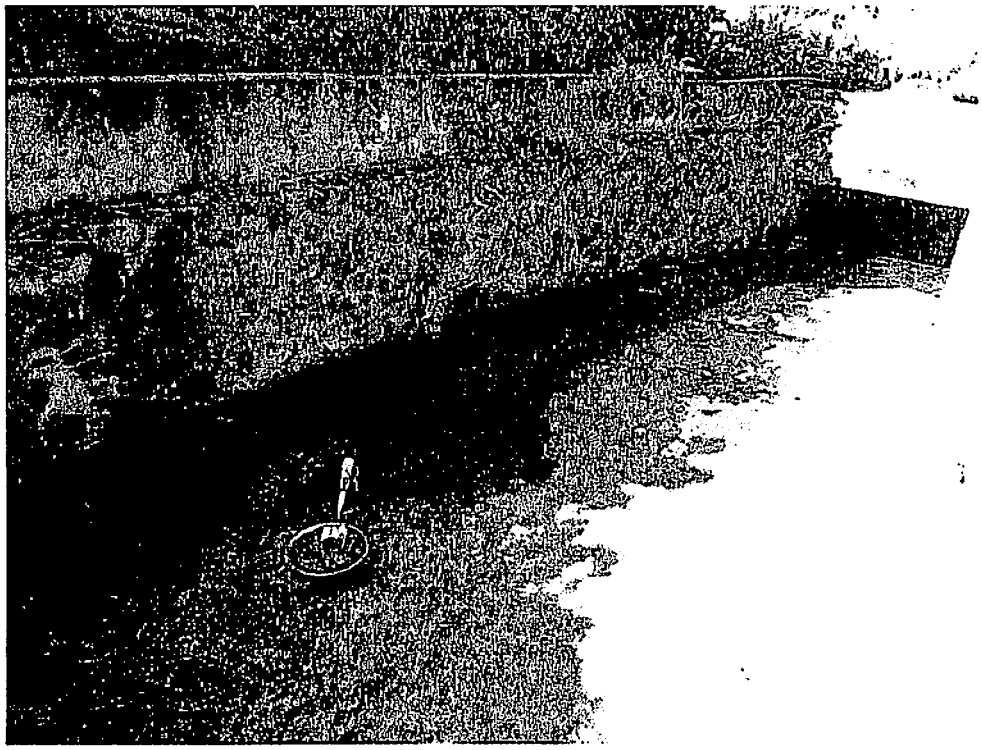
Site Photographs



Unpaved Area West (Downslope) of the Engineering Area – Two Surface Soils Samples Collected In this Area

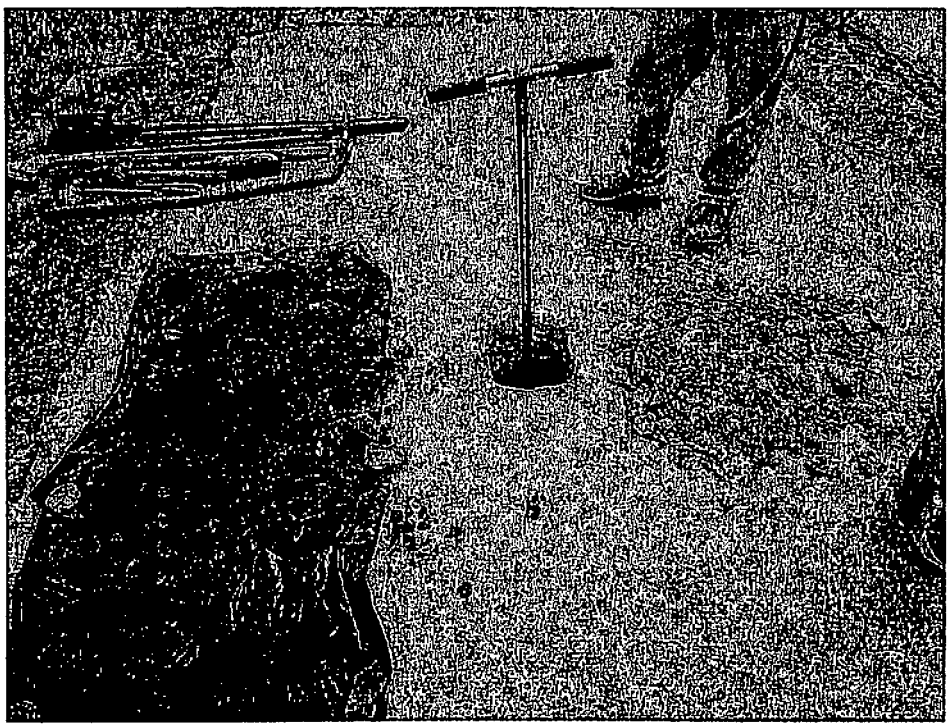
Unpaved Area North of the Engineering Area – Four Surface Soils Samples Collected In this Area

Paved Ditch North of Engineering Area – Sediment Sample Collected at this Location

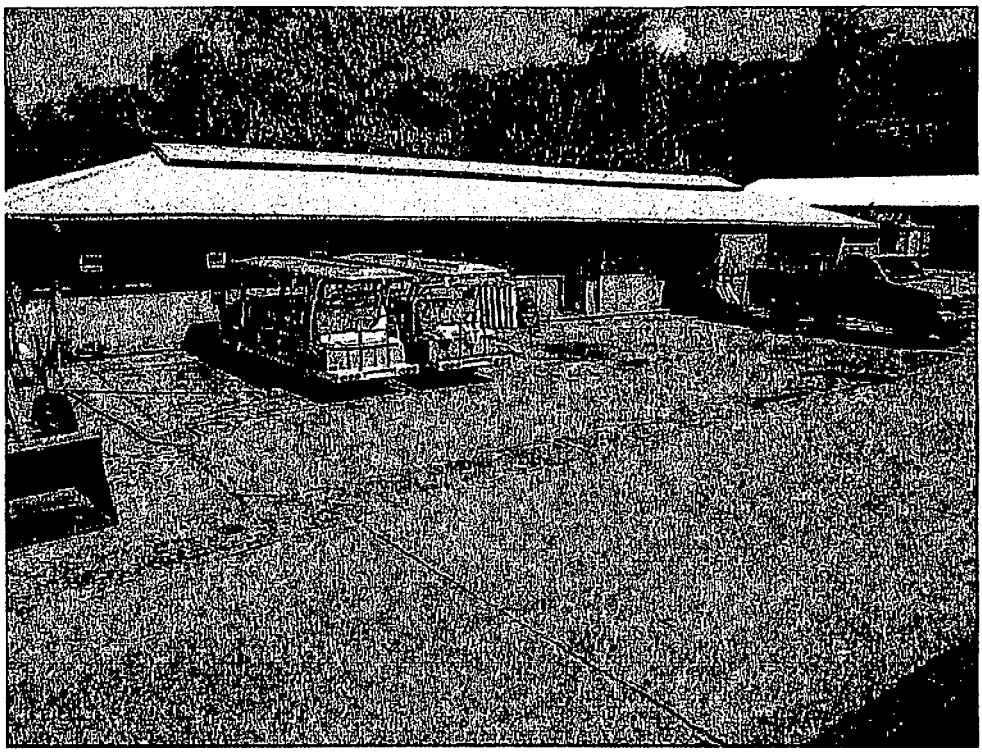


Paved Ditch Northwest of Engineering Area – Sediment Samples Collected in this Area

Former UST Location - Cutting Pavement for Borehole BH2

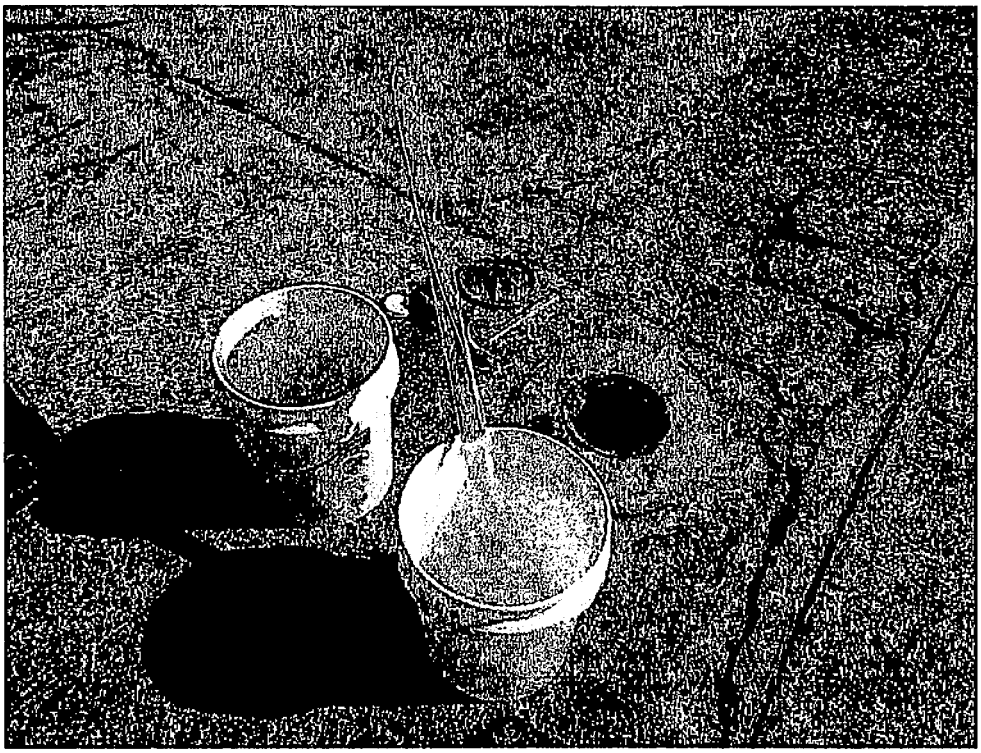


Former UST Location - Installing Borehole BH2



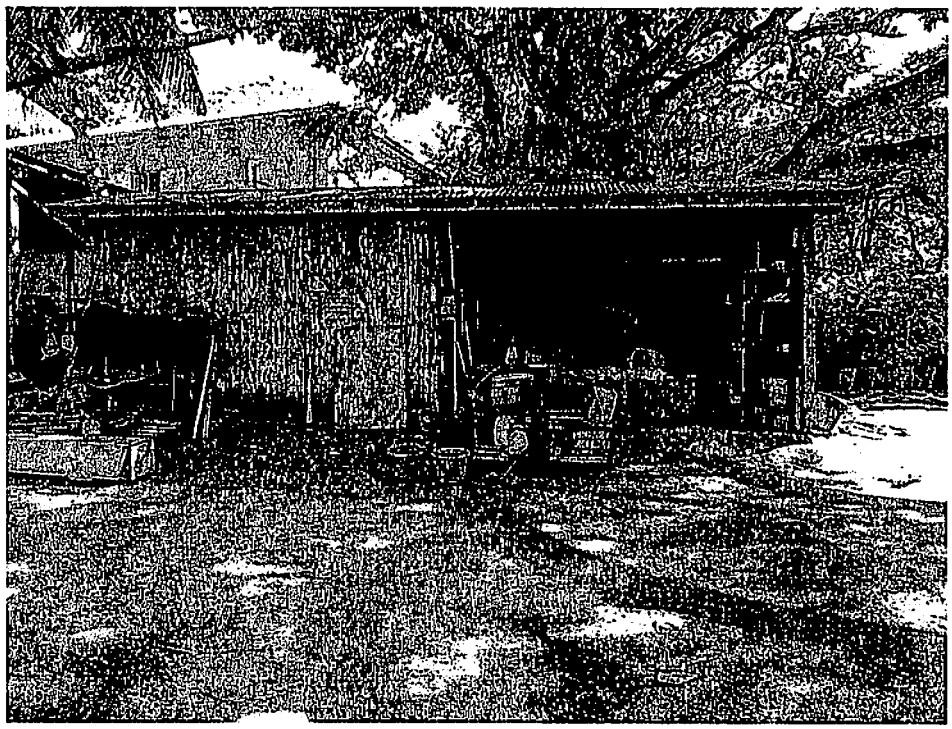
Former UST Location in Engineering Area

Concrete Pavement Patch at Former UST Location

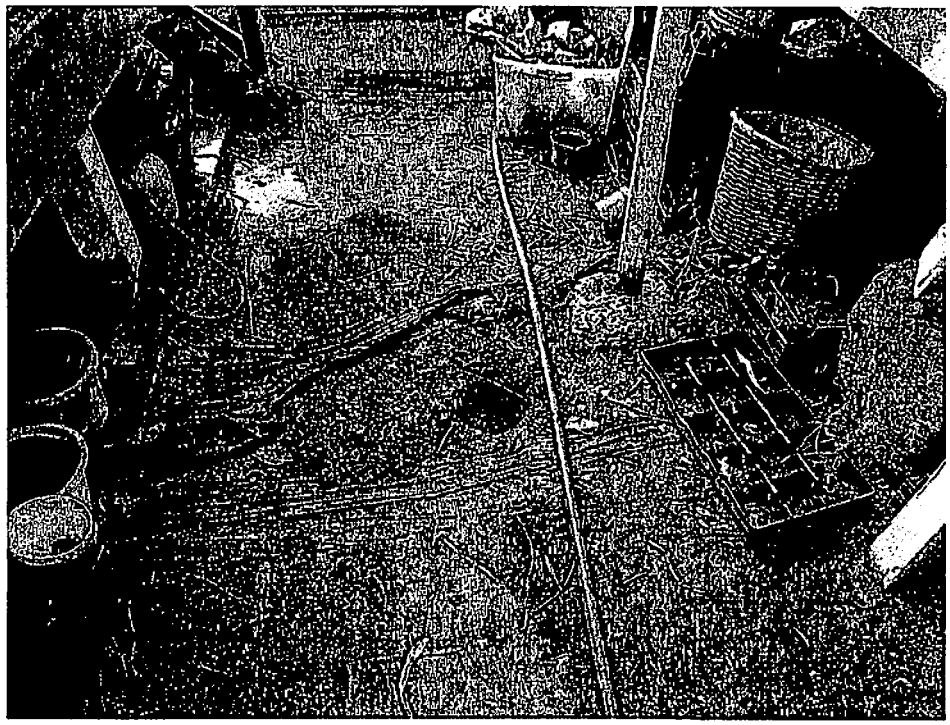


Monitoring Well Near Southwest Corner of Former UST Location

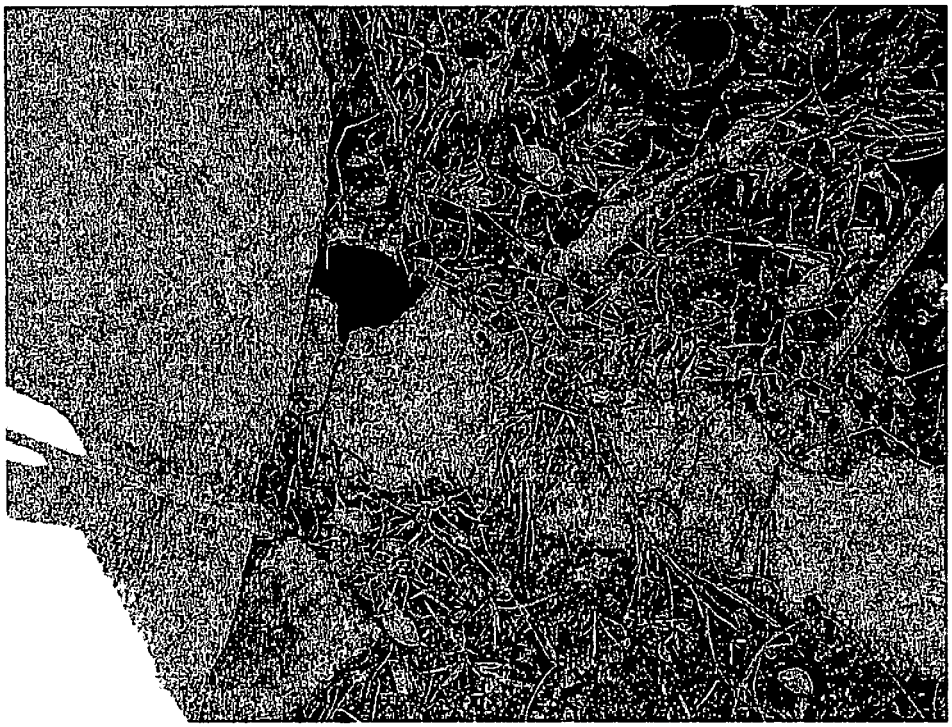
Boreholes Installed Through Pavement at Former UST Location – Borehole BH1 in Foreground



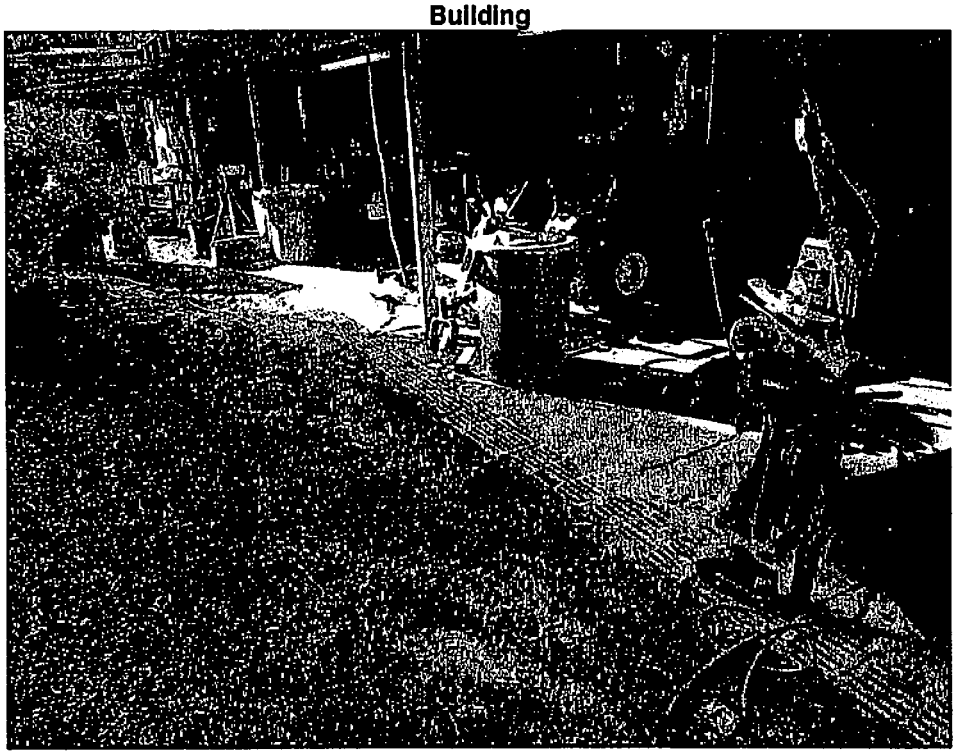
Grounds & Landscaping Chemical Storage Shed – Two Surface Soil Samples Collected at this Location



Grounds & Landscaping Greenhouse –Surface Soil Sample Collected at this Location

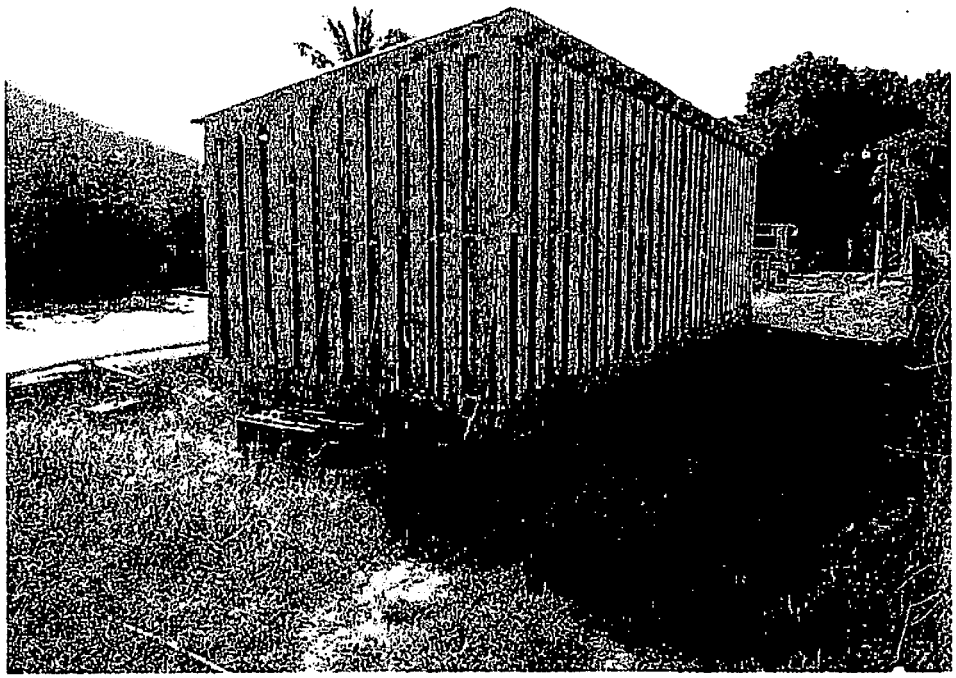


Grounds & Landscaping – Exposed Asbestos Pipe in Ground Near Equipment Maintenance Building



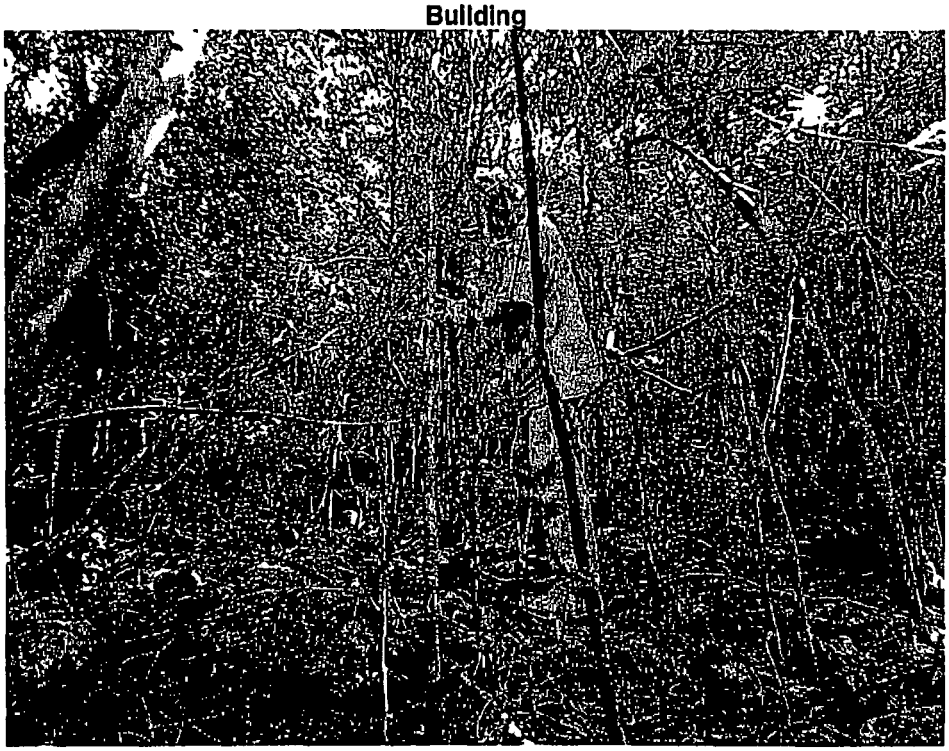
Grounds & Landscaping Equipment Maintenance Building – Surface Soil Samples Collected Here

Northwest Side of Emergency Generator Building - Surface Soil Sample Locations



Wastewater Treatment Plant Pump Building – Soil Sample Location Near Pallet of Batteries on Ground

Wastewater Treatment Plant Pump Building – Soil Sample Location Near Northwest Corner of Building



Debris Landfill at Base of Berm Near Southwest Edge of Fill – Surface Soil Sample 07-SS-01 Location

Debris Landfill – Depression in Fill Material – Composite Surface Soil Sample Location

Debris Landfill – Depression in Fill Material – Composite Surface Soil Sample Location

Appendix C

Results Summary Tables

Table 2 - Sample Location Rationale and Potential Contamination Indications
Caneel Bay Resort

Site Number & Name	Sample No.	Sample Type	Sample Depth (feet BGS)	Sample Location Rationale	Indications of Potential Contamination Observed in the Field
Site 1 - Engineering & Maintenance	01-SS-01	Surface soil	0 - 0.5	In stormwater runoff area downslope from south part of concrete-paved Site 1	None
Site 1 - Engineering & Maintenance	01-SS-02	Surface soil	0 - 0.5	In stormwater runoff area downslope from south part of concrete-paved Site 1	None
Site 1 - Engineering & Maintenance	01-SS-03	Surface soil	0 - 0.5	In stormwater runoff areas adjacent to north part of concrete paved Site 1	None
Site 1 - Engineering & Maintenance	01-SS-04	Surface soil	0 - 0.5	In stormwater runoff areas adjacent to north part of concrete paved Site 1	None
Site 1 - Engineering & Maintenance	01-SS-05	Surface soil	0 - 0.5	In stormwater runoff areas adjacent to north part of concrete paved Site 1	None
Site 1 - Engineering & Maintenance	01-SS-06	Surface soil	0 - 0.5	In stormwater runoff areas adjacent to north part of concrete paved Site 1	None
Site 1 - Engineering & Maintenance	01-SD-01	Sediment	0 - 0.5	In concrete-paved drainage ditch downslope & downstream from Site 1	None
Site 1 - Engineering & Maintenance	01-SD-02	Sediment	0 - 0.5	In concrete-paved drainage ditch downslope & downstream from Sites 1 & 3	None
Site 1 - Engineering & Maintenance	01-SD-03	Sediment	0 - 0.5	In concrete-paved drainage ditch downslope & downstream from Sites 1 & 3	None
Site 1 - Engineering & Maintenance	01-SD-04	Sediment	0 - 0.5	In concrete-paved drainage ditch downslope & downstream from Sites 1 & 3	None
Site 2 - Engineering Area Former UST	02-SU-01	Subsurface Soil	5.5 - 6.5	In former UST excavation; collected from near the water table	Slight petroleum odor
Site 2 - Engineering Area Former UST	02-SU-02	Subsurface Soil	5 - 7	In former UST excavation; collected from near the water table	Slight petroleum odor
Site 2 - Engineering Area Former UST	02-SU-03	Subsurface Soil	5 - 7	Duplicate of 02-SU-02	Slight petroleum odor
Site 2 - Engineering Area Former UST	02-GW-01	Groundwater	5 - 7.5	Monitoring well adjacent to and downgradient from former UST area	Strong petroleum odor; 3.3 ppm headspace PID reading
Site 3 - Grounds & Landscaping Chemical Storage Sheds	03-SS-01	Surface Soil	0 - 0.5	In compost & debris area	None
Site 3 - Grounds & Landscaping Chemical Storage Sheds	03-SS-02	Surface Soil	0 - 0.5	In greenhouse near irrigation sprinkler	None

Table 2 - Sample Location Rationale and Potential Contamination Indications
Caneel Bay Resort

Site Number & Name	Sample No.	Sample Type	Sample Depth (feet BGS)	Sample Location Rationale	Indications of Potential Contamination Observed in the Field
Site 3 - Grounds & Landscaping Chemical Storage Sheds	03-SS-03	Surface Soil	0 - 0.5	In reported former chemical storage area; 3 composited locations	None
Site 3 - Grounds & Landscaping Chemical Storage Sheds	03-SS-04	Surface Soil	0 - 0.5	In potted plant storage area near irrigation sprinkler	None
Site 3 - Grounds & Landscaping Chemical Storage Sheds	03-SS-05	Surface Soil	0 - 0.5	Adjacent to entrance to chemical storage shed	None
Site 3 - Grounds & Landscaping Chemical Storage Sheds	03-SS-06	Surface Soil	0 - 0.5	Adjacent to entrance to chemical storage shed	None
Site 4 - Grounds & Landscaping Equipment Maintenance Building	04-SS-01	Surface Soil	0 - 0.5	Adjacent to open-sided maintenance building with oily equipment; 2 composited locations	Gray stain; oil & metallic odor; PID up to 2 ppm
Site 4 - Grounds & Landscaping Equipment Maintenance Building	04-SS-02	Surface Soil	0 - 0.5	Adjacent to open-sided maintenance building with oily equipment; 3 composited locations	None
Site 5 - Emergency Generator Building	05-SS-01	Surface Soil	0 - 0.5	Adjacent to discharge point for surface runoff from outside building	None
Site 5 - Emergency Generator Building	05-SS-02	Surface Soil	0 - 0.5	Adjacent to discharge point for liquid runoff from inside building	None
Site 5 - Emergency Generator Building	05-SS-03	Surface Soil	0 - 0.5	Adjacent to discharge point for liquid runoff from inside building	None
Site 5 - Emergency Generator Building	05-SS-04	Surface Soil	0 - 0.5	Adjacent to discharge point for liquid runoff from inside building	None
Site 6 - Wastewater Treatment Plant	06-SS-01	Surface Soil	0 - 0.5	Adjacent to discharge point for oily surface runoff from inside pump building	Strong oil odor
Site 6 - Wastewater Treatment Plant	06-SS-02	Surface Soil	0 - 0.5	Adjacent to discharge point for oily surface runoff from inside pump building	None
Site 6 - Wastewater Treatment Plant	06-SS-03	Surface Soil	0 - 0.5	Adjacent to pump building & pallet of lead-acid batteries on ground	None
Site 7 - Debris Landfill	07-SS-01	Surface Soil	0 - 1	Adjacent to 15' high fill berm on southwest (downslope) edge of landfill; 2 composited locations	None
Site 7 - Debris Landfill	07-SS-02	Surface Soil	0 - 1	Inside 6' deep depression with exposed debris & garbage; 2 composited locations	Plastic & metal debris in soil
Site 7 - Debris Landfill	07-SS-03	Surface Soil	0 - 1	Inside 4' deep depression with exposed debris & garbage; 2 composited locations	None
Site 7 - Debris Landfill	07-SS-04	Surface Soil	0 - 1	Inside ' deep depression with exposed debris & garbage; 2 composited locations	Plastic, glass & metal debris in soil
Site 7 - Debris Landfill	07-SS-05	Surface Soil	0 - 1	Duplicate of 07-SS-01	Plastic & metal debris in soil

Table 3 - Soil Sample Laboratory Analytical Results Summary
Site 1 - Engineering Maintenance Area

Soil Sample Analytical Parameters (Units)	Screening Criteria				Sample Number & Results					
	RSL Resident Soil (mg/kg)	RSL Industrial Soil (mg/kg)	RSL SSL (mg/kg)	DPNR (mg/kg)	01-SS-01	01-SS-02	01-SS-03	01-SS-04	01-SS-05	01-SS-06
SVOCs (mg/kg)										
Benzo[a]anthracene	0.15	2.1	**0.01**	NE	ND	ND	ND	**0.081 I**	ND	**0.027 I**
Benzo[a]pyrene	**0.015**	0.21	**0.0035**	**0.1**	ND	ND	ND	**0.11 I**	ND	**0.046 I**
Benzo[b]fluoranthene	**0.15**	2.1	**0.035**	NE	ND	ND	ND	**0.16 I**	ND	**0.072 I**
Benzo[g,h,i]perylene	NE	NE	NE	2,500	ND	ND	ND	0.11 I	ND	0.036 I
Benzo[k]fluoranthene	1.5	21	0.35	NE	ND	ND	ND	ND	ND	0.027 I
Chrysene	15	210	1.1	NE	ND	ND	ND	ND	ND	0.033 I
Fluoranthene	230	2,200	7	3,200	ND	ND	ND	0.28 I	ND	0.11 I
Indeno[1,2,3-cd]pyrene	0.15	2.1	0.2	NE	ND	ND	ND	0.089 I	ND	0.031 I
Phenanthrene	NE	NE	NE	2,200	ND	ND	ND	0.17 I	ND	0.018 I
Pyrene	170	1,700	0.95	2,400	0.094 I	ND	ND	0.30 I	ND	0.11 I
DRO (mg/kg)	NE	NE	NE	**100**	**370**	27	4.1 I V	**300**	10 V	19 V
GRO (mg/kg)	NE	NE	NE	100	ND	ND	ND	ND	ND	ND
ORO (mg/kg)	NE	NE	NE	NE	350	33	3.6 I V	230	12 V	16 V
PCBs	NAP	NAP	NAP	NAP	ND	ND	ND	ND	ND	ND
Metals (mg/kg)*										
Silver - {NE}*	39	510	0.06	NE	ND	ND	ND	ND	ND	ND
Arsenic - {5.2}*	**0.61**	**2.4**	**0.0013**	NE	**7.8**	**2.6**	**5.7**	**19**	**15**	**42**
Barium - {440}*	1,500	19,000	**12**	NE	**53**	**57**	**95**	**120**	**110**	**79**
Cadmium - {NE}*	7 (Diet)	80 (Diet)	NE	NE	0.46 I	0.26 I	0.26 I	2.1	0.48 I	1.1
Chromium - {37}*	NE	NE	NE	NE	32	33	39	76	52	74
Lead - {16}*	400	800	NE	NE	19	26	8	130	37	18
Selenium - {0.26}*	39	510	**0.04**	NE	ND	**0.74 I**	ND	ND	**0.62 I**	**0.63 I**
Mercury - {0.058}*	1	4.3	**0.0033**	NE	**0.028 V**	**0.051 V**	**0.036 V**	**0.11 V**	**0.064 V**	**0.057 V**

Notes:
RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013
RSL SSL = Soil screening level for protection of groundwater. *Metals numbers in {brackets} are mean background values in conterminous U.S.
DPNR = U.S. Virgin Islands Department of Planning and Natural Resources Cleanup Standards
PCBs = Polychlorinated biphenyls. NAP = Not applicable, parameter group not detected.
SVOCs = Semi Volatile Organic Compounds. DRO = Diesel Range Organics. GRO = Gasoline Range Organics. ORO = Oil Range Organics.
Bold & underlined sample results exceed one or more of the screening criteria. **Bold** screening criteria are exceeded by one or more sample results.
Non-detect analytes may not be shown on the table.
Mg/kg = milligrams per kilogram. NE = Value not established. ND = not detected.
I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.
Yellow highlight indicates that metals value exceeds RSL and 1.5 times the background level.

Table 4 - Sediment Sample Laboratory Analytical Results Summary
Site 1 - Engineering and Maintenance Area

Sediment Sample Analytical Parameters (Units)	Screening Criteria					Sample Number & Results			
	RSL Resident Soil (mg/kg)	RSL Industrial Soil (mg/kg)	RSL SSL (mg/kg)	DPNR (mg/kg)	ESV Sediment (mg/kg)	01-SD-01	01-SD-02	01-SD-03	01-SD-04
Organophosphorous Pesticides	NAP	NAP	NAP	NAP	NAP	NA	ND	ND	ND
Organochlorine Pesticides (mg/kg)									
4,4'-DDD	2	7.2	0.0064	NE	0.0033	NA	0.02	ND	ND
4,4'-DDE	1.4	5.1	0.046	NE	0.0033	NA	0.016	0.0059 I	ND
4,4'-DDT	1.7	7	0.067	NE	0.0033	NA	0.0074 I	0.0027 I	ND
Dieldrin	0.03	0.11	0.000061	NE	0.0033	NA	0.0082 I	ND	ND
Herbicides						NA	ND	ND	ND
SVOCs (mg/kg)									
Benzo[a]pyrene	0.02	0.2	0.0035	0.1	0.33	0.12 I	ND	ND	ND
Benzo[b]fluoranthene	0.15	2.1	0.035	NE	NE	0.16 I	ND	0.081 I	ND
Benzo[g,h,i]perylene	NE	NE	NE	2,500	NE	0.11 I	ND	ND	ND
DRO (mg/kg)	NE	NE	NE	100	NE	24 V	37	17 V	3.7 IV
GRO (mg/kg)	NE	NE	NE	100	NE	ND	ND	ND	ND
ORO (mg/kg)	NE	NE	NE	NE	NE	30	65	36	2.6 IV
PCBs	NAP	NAP	NAP	NAP	NAP	ND	ND	ND	ND
Metals (mg/kg)									
Silver - {NE}*	39	510	0.06	NE	2	ND	ND	ND	ND
Arsenic - {5.2}*	0.61	2.4	0.0013	NE	7.24	2.6	1.4	0.99	0.98
Barium - {440}*	1,500	19,000	12	NE	NE	71	31	18	8.9
Cadmium - {NE}*	7 (Diet)	80 (Diet)	NE	NE	1	0.31 I	ND	0.13 I	ND
Chromium - {37}*	NE	NE	NE	NE	52.3	40	25	16	4.2
Lead - {16}*	400	800	NE	NE	30.2	17	3.2	6.7	1.5
Selenium - {0.26}*	39	510	0.04	NE	NE	ND	ND	ND	1.7
Mercury - {0.058}*	1	4.3	0.0033	NE	0.13	0.071 V	0.10 V	0.017 IV	0.016 IV

Notes:
RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013
RSL SSL = Soil screening level for protection of groundwater. *Metals numbers in {brackets} are mean background values in conterminous U.S.
DPNR = U.S. Virgin Islands Department of Planning and Natural Resources Cleanup Standards
ESV = Ecological screening values for sediment in Supplemental Guidance to RAGS: Region 4 Bulletins, Ecological Risk Assessment (EPA 2001)
PCBs = Polychlorinated biphenyls. NAP = Not applicable, parameter group not detected.
SVOCs = Semi Volatile Organic Compounds. DRO = Diesel Range Organics. GRO = Gasoline Range Organics. ORO = Oil Range Organics.
Bold & underlined sample results exceed one or more of the screening criteria. **Bold** screening criteria are exceeded by one or more sample results.
Non-detect analytes may not be shown on the table.
Mg/kg = milligrams per kilogram. NE = Value not established. ND = not detected. NA = Sample not analyzed for this parameter.
I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.
Yellow highlight indicates that metals value exceeds RSL and 1.5 times the background level.

Table 5 - Subsurface Soil Sample Laboratory Analytical Results Summary
Site 2 - Engineering Area Former UST

Soil Sample Analytical Parameters (Units)	Screening Criteria				Sample Number & Results		
	RSL Resident Soil (mg/kg)	RSL Industrial Soil (mg/kg)	RSL SSL (mg/kg)	DPNR (mg/kg)	02-SU-01	02-SU-02	02-SU-03 (Duplicate of 02-SU-02)
BTEX (mg/kg)					ND	ND	ND
Ethylbenzene	5.4	27	0.0015	1,500	0.00093 I	ND	ND
SVOCs (mg/kg)					ND	ND	ND
Fluoranthene	230	2,200	7	3,200	0.075 I	ND	ND
Pyrene	170	1,700	0.95	2,400	0.077 I	ND	ND
Metals (mg/kg)							
Lead - {16}*	400	800	NE	NE	7.5	8.3	6.6

Notes:

RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013

RSL SSL = Soil screening level for protection of groundwater. *Metals numbers in {brackets} are mean background values in conterminous U.S.

DPNR = U.S. Virgin Islands Department of Planning and Natural Resources Cleanup Standards

BTEX = Benzene, toluene, ethybenzene & xylenes. SVOCs = Semi Volatile Organic Compounds.

Bold & underlined sample results exceed one or more of the screening criteria. **Bold** screening criteria are exceeded by one or more sample results.

Non-detect analytes may not be shown on the table.

Mg/kg = milligrams per kilogram. NE = Value not established. ND = not detected.

I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.

Table 6 - Groundwater QC Sample Laboratory Analytical Results Summary
Site 2 - Engineering Area Former UST

Soil Sample Analytical Parameters (Units)	Screening Criteria		Sample Number & Results		
	RSL Tapwater (µg/L)	RSL MCL (µg/L)	02-GW-01	Rinsate Blank	Trip Blank
BTEX (µg/L)					
Benzene	**0.39**	5	**0.64 I**	ND	ND
Ethylbenzene	**1.3**	700	**49**	ND	ND
Toluene	86	1,000	0.72 I	ND	ND
Xylenes	19	10,000	2 I	ND	ND
SVOCs (µg/L)					
Acenaphthene	40	NE	0.91 I	ND	NA
Anthracene	130	NE	0.29 I	ND	NA
Fluoranthene	63	NE	0.68 I	ND	NA
Fluorene	22	NE	6.0 I	ND	NA
Naphthalene	**0.14**	NE	**19**	ND	NA
Phenanthrene	NE	NE	0.77 I	ND	NA
Pyrene	8.7	NE	0.48 I	ND	NA
1-Methylnaphthalene	**0.97**	NE	**13**	ND	NA
2-Methylnaphthalene	**2.7**	NE	**18**	ND	NA
GRO (µg/L)	NE	NE	NA	ND	NA
DRO (µg/L)	NE	NE	NA	72 IV	NA
PCBs	NAP	NAP	NA	ND	NA
Metals (mg/L)					
Lead	NE	15	0.0043 I	ND	NA
Mercury	0.063	2	NA	0.00012 IV	NA

Notes:

RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013

MCL = EPA maximum contaminant level for drinking water.

ESV = ecological screening values for soil and sediment in Supplemental Guidance to RAGS: Region 4 Bulletins, Ecological Risk Assessment (EPA 2001)

BTEX = Benzene, toluene, ethybenzene & xylenes. SVOCs = Semi Volatile Organic Compounds.

DRO = Diesel Range Organics. GRO = Gasoline Range Organics. NAP = Not applicable, parameter group not detected.

Bold & underlined sample results exceed one or more of the screening criteria. **Bold** screening criteria are exceeded by one or more sample results.

Non-detect analytes may not be shown on the table.

Mg/L = milligrams per liter. µg/L = micrograms per liter. NE = Value not established. ND = not detected. NA = Sample not analyzed for this parameter.

I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.

Table 7 - Soil Sample Laboratory Analytical Results Summary
Site 3 - Grounds and Landscaping Chemical Storage Sheds

	Screening Criteria			Sample Number & Results					
Soil Sample Analytical Parameters (Units)	RSL Resident Soil (mg/kg)	RSL Industrial Soil (mg/kg)	RSL SSL (mg/kg)	03-SS-01	03-SS-02	03-SS-03	03-SS-04	03-SS-05	03-SS-06
Organophosphorous Pesticides (mg/kg)									
Malathion	120	1,200	**0.0079**	ND	**0.0090 I**	ND	ND	ND	**0.14**
Organochlorine Pesticides (mg/kg)									
4,4'-DDD	2	7.2	0.0064	0.00013 I	0.001	0.00074 I	ND	0.0011	ND
4,4'-DDE	1.4	5.1	**0.046**	0.0037	0.022	0.019	**0.1**	**0.2**	0.032
4,4'-DDT	1.7	7	0.067	0.0013	0.012	0.0028	0.0066	0.022	0.0098
Aldrin	0.029	0.1	0.00065	ND	ND	0.00033 I	ND	0.00046 I	ND
alpha-Chlordane	1.6	6.5	**0.013**	ND	ND	**0.04**	ND	**0.069**	0.013
beta-BHC	0.27	0.96	**0.00013**	ND	ND	**0.00049 I**	ND	ND	ND
Dieldrin	0.03	0.11	**0.000061**	ND	**0.0013**	**0.013**	ND	**0.026**	**0.024**
Endosulfan I	37	370	0.11	ND	0.014	ND	ND	ND	ND
Endosulfan II	37	370	0.11	ND	0.017	0.0021	ND	ND	0.0028
Endosulfan sulfate	37	370	0.11	ND	0.0097	0.0013	ND	ND	0.0011
Endrin	1.8	18	0.0068	0.00079 I	ND	ND	ND	ND	ND
gamma-BHC (Lindane)	0.52	2.1	**0.00021**	ND	ND	ND	ND	ND	**0.0021**
gamma-Chlordane	1.6	6.5	**0.013**	ND	ND	**0.023**	ND	**0.034**	0.0048
Heptachlor	0.11	0.38	**0.00014**	ND	ND	ND	ND	**0.00065 I**	ND
Heptachlor epoxide	0.053	0.19	**0.000068**	ND	ND	ND	ND	**0.0018**	ND
Herbicides	NAP	NAP	NAP	ND	ND	ND	ND	ND	ND
Nutrients (mg/kg)									
Nitrate as N	13,000	160,000	NE	15	20	13	12	13	170
Nitrite as N	780	10,000	NE	15	13	14	ND	14	ND
Nitrate Nitrite as N	NE	NE	NE	30	33	27	12	27	170
Metals (mg/kg)									
Silver - {NE}*	39	510	**0.06**	ND	ND	ND	ND	**0.23 I**	**0.26 I**
Arsenic - {5.2}*	**0.61**	**2.4**	**0.0013**	**1.1**	**15**	**2.5**	**4**	**1.6**	**30**
Barium - {440}*	1,500	19,000	**12**	**36**	**58**	**42**	**59**	**42**	**41**
Cadmium - {NE}*	7 (Diet)	80 (Diet)	NE	0.16 I	0.40 I	0.38 I	0.47 I	0.27 I	0.61
Chromium - {37}*	NE	NE	NE	17	45	24	33	33	56
Lead - {16}*	400	800	NE	7.7	15	20	41	13	9.1
Selenium - {0.26}*	39	510	**0.04**	**1.6**	**0.51 I**	**0.57 I**	**0.68 I**	ND	ND
Mercury - {0.058}*	1	4.3	**0.0033**	ND	**0.019**	ND	**0.021**	**0.032**	**0.025**

Notes:
RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013
RSL SSL = Soil screening level for protection of groundwater. *Metals numbers in {brackets} are mean background values in conterminous U.S.
DPNR TPH Limit = U.S. Virgin Islands Department of Planning and Natural Resources, Total Petroleum Hydrocarbon Limit
Bold & underlined sample results exceed one or more of the screening criteria. Bold screening criteria are exceeded by one or more sample results.
Non-detect analytes may not be shown on the table.
Mg/kg = milligrams per kilogram. NE = Value not established. ND = not detected. NAP = Not applicable, parameter group not detected.
I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.
Yellow highlight indicates that metals value exceeds RSL and 1.5 times the background level.

Table 8 - Soil Sample Laboratory Analytical Results Summary
Site 4 - Grounds and Landscaping Equipment Maintenance Building

Soil Sample Analytical Parameters (Units)	Screening Criteria				Sample Number & Results	
	RSL Resident Soil (mg/kg)	RSL Industrial Soil (mg/kg)	RSL SSL (mg/kg)	DPNR (mg/kg)	04-SS-01	04-SS-02
SVOCs (mg/kg)						
Benzo[b]fluoranthene	0.15	2.1	**0.035**	NE	ND	**0.070 I**
GRO (mg/kg)	NE	NE	NE	100	ND	0.092 I
ORO (mg/kg)	NE	NE	NE	NE	220	86
Metals (mg/kg)						
Silver - {NE}*	39	510	0.06	NE	ND	ND
Arsenic - {5.2}*	**0.61**	**2.4**	**0.0013**	NE	**4.9**	**4.6**
Barium - {440}*	1,500	19,000	**12**	NE	**40**	**34**
Cadmium - {NE}*	7 (Diet)	80 (Diet)	NE	NE	0.50 I	0.40 I
Chromium - {37}*	NE	NE	NE	NE	37	27
Lead - {16}*	400	800	NE	NE	41	16
Selenium - {0.26}*	39	510	**0.04**	NE	ND	**0.56 I**
Mercury - {0.058}*	1	4.3	**0.0033**	NE	**0.028 V**	**0.031 V**

Notes:

RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013

RSL SSL = Soil screening level for protection of groundwater. *Metals numbers in {brackets} are mean background values in conterminous U.S.

DPNR = U.S. Virgin Islands Department of Planning and Natural Resources Cleanup Standards

SVOCs = Semi Volatile Organic Compounds. GRO = Gasoline Range Organics. ORO = Oil Range Organics.

Bold & underlined sample results exceed one or more of the screening criteria. **Bold** screening criteria are exceeded by one or more sample result

Non-detect analytes may not be shown on the table.

Mg/kg = milligrams per kilogram. NE = Value not established. ND = not detected.

I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.

Yellow highlight indicates that metals value exceeds RSL and 1.5 times the background level.

Table 9 - Soil Sample Laboratory Analytical Results Summary
Site 5 - Emergency Generator Building

Soil Sample Analytical Parameters (Units)	Screening Criteria				Sample Number & Results			
	RSL Resident Soil (mg/kg)	RSL Industrial Soil (mg/kg)	RSL SSL (mg/kg)	DPNR (mg/kg)	05-SS-01	05-SS-02	05-SS-03	05-SS-04
SVOCs (mg/kg)					ND		ND	ND
Pyrene	170	1,700	0.95	2,400	ND	0.083 I	ND	ND
DRO (mg/kg)	NE	NE	NE	100	**310**	**620**	98	**480**
ORO (mg/kg)	NE	NE	NE	NE	93	590	79	110
Metals (mg/kg)								
Silver - {NE}*	39	510	**0.06**	NE	**3.5**	**1.1**	**0.45 I**	**0.38 I**
Arsenic - {5.2}*	**0.61**	**2.4**	**0.0013**	NE	**30**	**35**	**49**	**57**
Barium - {440}*	1,500	19,000	**12**	NE	**88**	**38**	**67**	**81**
Cadmium - {NE}*	**7 (Diet)**	80 (Diet)	NE	NE	**7.3**	4.5	4.4	1.8
Chromium - {37}*	NE	NE	NE	NE	90	68	60	37
Lead - {16}*	400	800	NE	NE	180	100	83	59
Selenium - {0.26}*	39	510	**0.04**	NE	**1.1 IV**	ND	ND	ND
Mercury - {0.058}*	1	4.3	**0.0033**	NE	**0.083**	**0.34**	**0.026**	**0.022**

Notes:

RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013

RSL SSL = Soil screening level for protection of groundwater. *Metals numbers in {brackets} are mean background values in conterminous U.S.

DPNR = U.S. Virgin Islands Department of Planning and Natural Resources Cleanup Standards

SVOCs = Semi Volatile Organic Compounds. DRO = Diesel Range Organics. ORO = Oil Range Organics.

Bold & underlined sample results exceed one or more of the screening criteria. **Bold** screening criteria are exceeded by one or more sample results.

Non-detect analytes may not be shown on the table.

Mg/kg = milligrams per kilogram. NE = Value not established. ND = not detected.

I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.

Yellow highlight indicates that metals value exceeds RSL and 1.5 times the background level.

Table 10 - Soil Sample Laboratory Analytical Results Summary
Site 6 - Wastewater Treatment Plant

Soil Sample Analytical Parameters (Units)	Screening Criteria				Sample Number & Results		
	RSL Resident Soil (mg/kg)	RSL Industrial Soil (mg/kg)	RSL SSL (mg/kg)	DPNR (mg/kg)	06-SS-01	06-SS-02	06-SS-03
SVOCs (µg/kg)							
Acenaphthene	340	3,300	0.41	2,400	ND	ND	0.0065 I
Anthracene	1,700	17,000	4.2	21,000	ND	ND	0.12 I
Benzo[a]anthracene	**0.15**	2.1	**0.01**	NE	ND	ND	**0.20 I**
Benzo[a]pyrene	**0.015**	0.21	**0.0035**	**0.1**	ND	**0.049**	**0.16 I**
Benzo[b]fluoranthene	**0.15**	2.1	**0.035**	NE	ND	ND	**0.20 I**
Benzo[g,h,i]perylene	NE	NE	NE	2,500	ND	ND	0.085 I
Benzo[k]fluoranthene	1.5	21	0.35	NE	ND	ND	0.0069 I
Chrysene	15	210	1.1	NE	ND	ND	0.17 I
Fluoranthene	230	2,200	7	3,200	ND	0.062 I	0.43 I
Fluorene	230	2,200	0.4	2,600	ND	ND	0.041 I
Indeno[1,2,3-cd]pyrene	0.15	2.1	0.2	NE	ND	0.042 I	0.085 I
Phenanthrene	NE	NE	NE	2,200	ND	ND	0.41 I
Pyrene	170	1,700	0.95	2,400	0.066 I	0.080 I	0.36 I
ORO (mg/kg)	NE	NE	NE	NE	4,100	52	3.6 IV
PCBs (mg/kg)	NAP	NAP	NAP	NAP	ND	ND	ND
Metals (mg/kg)							
Silver - {NE}*	39	510	**0.06**	NE	ND	**0.62 I**	ND
Arsenic - {5.2}*	**0.61**	**2.4**	**0.0013**	NE	**5.3**	**5.6**	**4**
Barium - {440}*	1,500	19,000	**12**	NE	**47**	**70**	**55**
Cadmium - {NE}*	7 (Diet)	80 (Diet)	NE	NE	0.35 I	0.65 I	0.28 I
Chromium - {37}*	NE	NE	NE	NE	45	71	63
Lead - {16}*	400	800	NE	NE	14	23	19
Selenium - {0.26}*	39	510	**0.04**	NE	**0.77 IV**	**1.0 IV**	ND
Mercury - {0.058}*	1	4.3	**0.0033**	NE	**0.03**	**0.27**	**0.017 I**

Notes:
RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013
RSL SSL = Soil screening level for protection of groundwater. *Metals numbers in {brackets} are mean background values in conterminous U.S.
DPNR = U.S. Virgin Islands Department of Planning and Natural Resources Cleanup Standards
PCBs = Polychlorinated biphenyls.
SVOCs = Semi Volatile Organic Compounds. DRO = Diesel Range Organics. ORO = Oil Range Organics.
Bold & underlined sample results exceed one or more of the screening criteria. **Bold** screening criteria are exceeded by one or more sample results.
Non-detect analytes may not be shown on the table.
Mg/kg = milligrams per kilogram. NE = Value not established. ND = not detected. NAP = Not applicable, parameter group not detected.
I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.
Yellow highlight indicates that metals value exceeds RSL and 1.5 times the background level.

Table 11 - Soil Sample Laboratory Analytical Results Summary
Site 7 - Debris Landfill

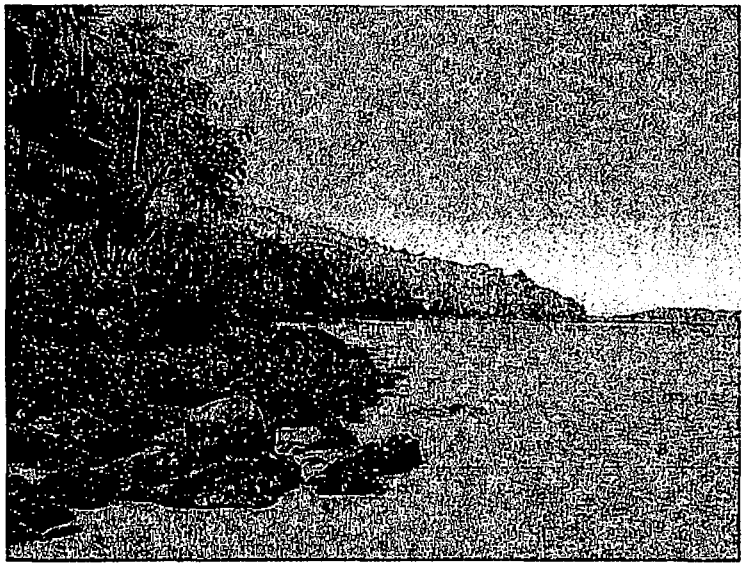
Soil Sample Analytical Parameters (Units)	Screening Criteria				Sample Number & Results				
	RSL Resident Soil (mg/kg)	RSL Industrial Soil (mg/kg)	RSL SSL (mg/kg)	DPNR (mg/kg)	07-SS-01	07-SS-05 (Duplicate of 07-SS-01)	07-SS-02	07-SS-03	07-SS-04
Organophosphorous Pesticides	NAP	NAP	NAP	NAP	ND	ND	ND	ND	ND
Organochlorine Pesticides (mg/kg)									
4,4'-DDD	2	7.2	0.0064	NE	0.00012 I	ND	ND	ND	0.0014 I
4,4'-DDE	1.4	5.1	0.046	NE	0.00065 I	ND	0.0085	0.013	0.021
4,4'-DDT	1.7	7	0.067	NE	0.00049 I	ND	0.0016 I	0.0042 I	0.0087 I
alpha-Chlordane	1.6	6.5	0.013	NE	ND	ND	0.0019 I	0.0017 I	ND
Dieldrin	0.03	0.11	0.000061	NE	ND	ND	0.0010 I	0.00059 I	0.0012 I
gamma-Chlordane	1.6	6.5	0.013	NE	ND	ND	0.00088 I	0.00065 I	ND
Herbicides	NAP	NAP	NAP	NAP	ND	ND	ND	ND	ND
SVOCs (µg/kg)									
Anthracene	1,700	17,000	4.2	21,000	ND	ND	0.042 I	ND	0.031 I
Benzo[a]anthracene	0.15	2.1	0.01	NE	ND	ND	0.24 I	0.052 I	0.11 I
Benzo[a]pyrene	0.015	0.21	0.0035	0.1	ND	ND	0.21 I	0.068 I	0.11 I
Benzo[b]fluoranthene	0.15	2.1	0.035	NE	ND	ND	0.31 I	0.10 I	0.14 I
Benzo[g,h,i]perylene	NE	NE	NE	2,500	ND	ND	0.14 I	0.053 I	0.063 I
Benzo[k]fluoranthene	1.5	21	0.35	NE	ND	ND	0.10 I	ND	0.053 I
Chrysene	15	210	1.1	NE	ND	ND	0.23 I	0.040 I	0.12 I
Fluoranthene	230	2,200	7	3,200	ND	ND	0.48 I	0.13 I	0.28 I
Indeno[1,2,3-cd]pyrene	0.15	2.1	0.2	NE	ND	ND	0.13 I	0.051 I	0.060 I
Phenanthrene	NE	NE	NE	2,200	ND	ND	0.20 I	0.052 I	0.15 I
Pyrene	170	1,700	0.95	2,400	ND	ND	0.41 I	0.11 I	0.23 I
PCBs (mg/kg)									
PCB-1260	0.22	0.74	0.024	NE	ND	ND	ND	0.028	0.039
Metals (mg/kg)									
Silver - {NE}*	39	510	0.06	NE	ND	ND	ND	ND	ND
Arsenic - {5.2}*	0.61	2.4	0.0013	NE	0.8	0.7	5.8	4.3	2.1
Barium - {440}*	1,500	19,000	12	NE	80	51	79	58	72
Cadmium - {NE}*	7 (Diet)	80 (Diet)	NE	NE	ND	ND	0.29 I	0.39 I	0.25 I
Chromium - {37}*	NE	NE	NE	NE	14	14	27	36	30
Lead - {16}*	400	800	NE	NE	5.4	5.6	11	10	15
Selenium - {0.26}*	39	510	0.04	NE	ND	0.49 IV	ND	0.68 IV	0.82 IV
Mercury - {0.058}*	1	4.3	0.0033	NE	0.018	0.021	0.04	0.052	0.059

Notes:
RSL = U.S. EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, November 2013
RSL SSL = Soil screening level for protection of groundwater. *Metals numbers in {brackets} are mean background values in conterminous U.S.
DPNR = U.S. Virgin Islands Department of Planning and Natural Resources Cleanup Standards
PCBs = Polychlorinated biphenyls.
SVOCs = Semi Volatile Organic Compounds.
Bold & underlined sample results exceed one or more of the screening criteria. **Bold** screening criteria are exceeded by one or more sample results.
Non-detect analytes may not be shown on the table.
Mg/kg = milligrams per kilogram. NE = Value not established. ND = not detected. NAP = Not applicable, parameter group not detected.
I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
V = Indicates that the analyte was detected at or above the method detection limit in both the sample and the associated method blank and the value of 10 times the blank value was equal to or greater than the associated sample value.
Yellow highlight indicates that metals value exceeds RSL and 1.5 times the background level.

REMOVAL SITE EVALUATION REPORT

Caneel Bay Resort

St. John, U.S. Virgin Islands



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January 2017

FINAL

REMOVAL SITE EVALUATION

Caneel Bay Resort

St. John, U.S. Virgin Islands

3E Project No. 1395-015

Purchase Order No. P16PX02147

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1.0 INTRODUCTION

1.1 Caneel Bay Resort Location and Description

The subject property consists of approximately 150 acres and is located on the west side of St. John, United State Virgin Islands (USVI) within the Virgin Islands National Park. Caneel Bay is owned by Virgin Islands National Park (VIIS) on St. John, USVI and operated through a retained use estate by Caneel Bay Internal Acquisitions. The property currently operates as a resort with approximately 100 buildings and structures, used for lodging, food services, recreation, landscape and maintenance, security and utility. The property primarily consists natural vegetation and fauna. The resorts facilities are bordered by beaches to the north and west and to the south and east by undeveloped land. **Figures 1 and 2** illustrate the project location and general property layout.

1.2 Purpose and Objective

This Removal Site Evaluation (RSE) report for Caneel Bay Resort (Site) was conducted by 3E Consultants (3E) for the National Park Service (NPS) in general accordance with the requirements detailed in 40 Code of Federal Regulations (CFR) 300.410 and pursuant purchase order P16PX02147 dated July 12, 2016.

The purpose for this project was to evaluate conditions at the Caneel Bay Resort to assess the potential threat posed by the release or threatened release of hazardous substances to public health, welfare, and the environment, determine the need for additional Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) action, and evaluate whether a removal action is appropriate.

2.0 SCOPE OF WORK

2.1 Document Review

To aid in the understanding of the Site background and history, 3E reviewed the following documents:

- Caneel Bay Legislation-2010.pdf
- 1983 Lead Agreement-CBIA to VIIS.pdf
- VIIS RUE Briefing Statement 4.22.16-Bill Stevens. Docx
- HR714 Virgin Islands-Caneel Bay Lease.doc
- Caneel Bay and Turtle Resort PW Violation Report.pdf
- Water and Wastewater issues at Caneel Bay.docx
- Caneel Bay Wastewater Report.pdf
- VIIS Caneel Bay Report Level 1 ESA report 9.4.12.doc
- LEVEL 2 ESA Report 3.4.14.pdf

As identified through review of the above referenced documents and specifically the Level I Environmental Site Assessment (ESA) and a Level II ESA, the Caneel Bay property has seven sites with identified and confirmed contamination from operations at the resort. The areas of contamination are listed as:

- Site 1 Engineering and Maintenance Area
- Site 2 Engineering Area Former UST
- Site 3 Grounds and Landscaping Chemicals Storage Sheds
- Site 4 Grounds and Landscaping Equipment Maintenance Building
- Site 5 Emergency Generator Building
- Site 6 Waste Water Treatment Plant
- Site 7 Debris Landfill.

Six of the sites have confirmed soil contamination with Site 2 being the only site confirmed with groundwater contamination. The chemicals of concern impacting soil at the above sites consist of pesticides, semi volatile organic compounds (SVOCs), silver, arsenic, barium, cadmium, PCBs, selenium, and mercury. These soil impacts exceed the US Environmental Protection Agency (EPA) Regional Screening Levels (RSLs) for soil screening protection of groundwater (SSL). Soil concentrations also exceed leachability criteria at these Sites; therefore, resulting in a potential for shallow groundwater environmental impacts. Groundwater contaminants of concern consists of benzene, ethylbenzene, naphthalene, and 1- and 2-methylnaphthalene. These groundwater concentrations exceed their respective RSLs for tap water.

2.2 Environmental Database and Aerial Review

3E updated the electronic database report for the complete St. John Island. An electronic data search of federal, state and local government environmental records was conducted by Environmental Data Resources, Inc. (EDR). The result of the search is a "Zip" report listing all sites located in the same zip code as the subject property, rather than a map of the sites. St. John is covered by the same zip code (00830). The specific databases searched and sites found are listed in the EDR ZIP/PLUS™ Report, which is included as **Appendix A.**

All sites listed in the Zip Report were reviewed to verify the locations with respect to the subject property. As previously reported, listed sites are in Cruz Bay and are within 0.5 miles of the subject property. However, all the listed sites, are separated hydrologically or topographically from the subject site. The subject site is listed on the EDR report. The Caneel Bay Hotel site listing indicates that the facility is currently not a Resource Conservation and Recovery Act (RCRA) hazardous waste generator, and has no violations listed. In 1992 the facility was a RCRA large quantity hazardous waste generator with no violations noted. The Caneel Bay Hotel site is listed as a Facility Index Site (FINDS) which lists the RCRA generator status and a surface water pollutant discharge permit (NPDES). No site-specific details were observed. No additional information was listed since the previous EDR in the Level 1 Report in 2012.

As part of 3E's review, historical aerial photographs from GeoSearch were obtained for the following years dated 1954, 1983, 1999, 2004, 2006, 2007 and 2011. The 1954 aerial photograph indicates that the resort was partially constructed and was present on the subject property. The adjacent properties were undeveloped woods, beaches, water bodies and a road (Highway 20). The 1983 to 2011 photographs indicate that the land use of the subject site and adjoining properties are similar to the current land use. Copies of the aerial photographs are included in **Appendix B.**

2.3 Onsite Review

The purpose of the onsite review was to verify the information found in the supplied historical documents and compare the current facility operations to those specifically described in the Level 1 and Level 2 Reports. The onsite review was completed on September 8th, 2016 to verify the areas defined in the Level 2 Report and to identify additional onsite sources as they relate to the visual observation and determine if additional environmental impacts associated with the operation and maintenance of the resort have occurred since the date of the last report (2014). 3E personnel was escorted by Mr. Brad Dow, Director of Engineering with Caneel Bay Resort during the visit. Site Photographs are provided in **Appendix C.**

2.3.1 Site 1 Engineering and Maintenance Area

The Level 1 Report completed in 2012 discussed the numerous open containers of oil and oil filters, batteries, and generally bad housekeeping practices. These have since been corrected as the oil waste area has been completely revamped. Otherwise, the engineering and maintenance area appeared as it did in

the 2014 Level 2 Report. A floor drain and sink drain were observed northeast of the carpentry shop that was not mentioned in the previous reports. Based on visual review and coordination with the onsite escort it was not able to be determined where the outfall of the drain was located; therefore, we were unable to determine if any environmental impacts may have occurred from historical uses in this area.

Stressed vegetation observed in the 2014 Level 2 Report was observed during our site visit around buildings and AST pads in the engineering and maintenance area. Mr. Dow stated that the stressed vegetation was from their weed control application. A weed control plan including what types of pesticide/herbicides being applied and by whom was requested from Mr. Dow; however, this information was not made available for review to confirm if proper application techniques and volumes are being used.

From the 2014 Level 2 Report, three sediment samples exceeded RSL screening criteria for SVOCs and/or organochlorine pesticides that were collected from the concrete paved drainage north of the engineering maintenance area. The concrete paved drainage ditch that runs west to east across the site discharges to the beach on the west shore of Caneel Bay beneath the dock. According to Mr. Dow, stormwater runoff from offsite also flows through the ditch. Due to the unknown nature of the offsite impacts to the drainage ditch it was unable to be determined if the exceedances observed in the 2014 report were due to onsite or offsite sources. See attached **Figure 3.**

2.3.2 Site 2 Engineering Area Former UST

From the 2014 Level 2 Report, the former UST located south of the engineering warehouse concrete patch appears similar to what was observed in 2014. The monitoring well located on the southwest corner of the concrete patch area was also observed. The concrete patch appeared to be intact. No closure documents or information was available for review to confirm the removal procedures or if samples were collected as part of the removal operations. See attached **Figure 4.**

2.3.3 Site 3 Grounds and Landscaping Chemical Storage Sheds

The 2012 Level 1 Report mentioned ripped bags of herbicides and pesticides spilled onto unpaved floors. These items were not observed and appeared to be better organized. However, a new pole barn that was not present in in either 2012 or 2014 report was observed east of the Chemical Storage Sheds. Visible petroleum staining was observed on a pervious surface from a nearby lawn mower. See attached **Figure 5.**

2.3.4 Site 4 Grounds and Landscaping Equipment Maintenance Building

The 2012 Level 1 Report mentioned an open-sided equipment maintenance building with numerous pieces of oily equipment, oil stained tables, oil-stained concrete floors, open containers of used motor oil, and numerous cans of gasoline and oil, and an oily odor was present in the area. The maintenance building appeared similar except no oily odor or open containers of used motor oil, gasoline or oil were observed. See attached **Figure 6.**

2.3.5 SITE 5 EMERGENCY GENERATOR BUILDING

This building is west of engineering and houses two large diesel-powered emergency electric generators. The 2012 Level 1 Report stated that a strong oily odor was present in the building; the concrete floor beneath the generators was oil stained; and that several large lead-acid batteries were present on the floor of the building. This was not the case during 3E's site survey; these items appear to have been remedied.

However, the report did not mention the gasoline/diesel pump located on a pervious surface beside an asphalt paved road. 3E noted petroleum soil staining around the fuel pump on the pervious surface. Additionally, the asphalt paved road is sloped downgradient of the fuel pump towards another pervious area. Soil and groundwater samples were not collected to determine if there are environmental impacts associated with these fueling operations. See attached **Figure 7.**

2.3.6 SITE 6 WASTEWATER TREATMENT PLANT

The Level 2 Report completed in 2014 showed numerous chemical storage containers of varying size within the building and slight staining on the concrete floor. The building no longer stores these materials inside and the concrete floor had been sealed and repainted. Additionally, a Level 2 Report soil sample location outside at the northwest corner of the building has been concrete paved over.

3E observed multiple unmarked and unlabeled 55-gallon drums approximately 300 feet east of the wastewater treatment plant pump building in a laydown yard within a wooded area. The number of drums is not known because they were covered in shade cloth and partially buried with fill. The drums that were visible were rusted and in poor condition containing various amounts of unknown liquid. Waste characterization of the drum contents was not conducted to determine if the drum contents are hazardous or non-hazardous. Soil and groundwater samples were also not collected to determine if environmental impacts may have occurred. See attached **Figure 8.**

2.3.7 SITE 7 DEBRIS LANDFILL

The debris landfill area appears to have less vegetation debris than what was observed in the 2014 photographs. Mr. Dow stated that they plan to employ a wood chipper in the future to reduce the overall bulk. 3E observed the following while onsite:

- The previously noted depression contained rubber, glass and other non-organic materials layered throughout the depression.
- Observed excavation and stockpiling activities in proximity to the southern side of the debris landfill. Mr. Dow stated they may use some of the onsite fill in other areas at the resort.
- Un-sampled fill material was being used onsite outside of the landfill area. Without proper analytical analysis of this material, there is a potential to be spreading impacted media to un-impacted areas of the property.

- Per conversation with onsite personnel, the vertical and horizontal extent of the landfill and its contents are not known therefore the actual environmental impacts are unable to be determined.

See attached **Figure 9.**

3.0 REGULATORY REVIEW

This report documents the results of the RSE as required Section 300.410. The RSE was conducted to assess the threat posed to public health, welfare and the environment by the release and threat of future releases of hazardous substances on and from the Site, and to evaluate the need for removal action pursuant to 40 CFR 300.415CLA.

3.1 Source and Nature of the Release of Contaminants

3.1.1 Site 1 Engineering and Maintenance Area

Source 1 - Operations within and around the maintenance buildings in pervious areas may be a potential source. The known soil contaminants are SVOCs, TPH DRO, arsenic and mercury. All these contaminants except TPH DRO exceed the US EPA RSLs for SSL.

Source 2 - Sediment from deposits in the concrete paved drainage ditch pervious down slope. The known soil contaminants exceeded RSLs for SSL screening criteria for SVOCs and/or organochlorine pesticides, arsenic, barium and mercury.

The exposed pervious soil at these locations may pose a potential threat to the public through direct exposure and given that the soil concentrations exceed leachability criteria may pose a potential threat to the environment and ecological aspects of the surrounding habitat.

3.1.2 Site 2 Engineering Area Former UST

Source - The operations of the former UST. The known groundwater contaminants exceeding RSL tap water are benzene, ethylbenzene, naphthalene, and 1- and 2-methylnaphthalene.

The groundwater and potential for petroleum impacted soil at this location pose a potential threat to the environment and ecological aspects of the surrounding habitat.

3.1.3 Site 3 Grounds and Landscaping Chemical Storage Sheds

Source 1 - Operations within and around the landscaping chemical storage sheds may be a potential source. The known soil contaminants are organophosphorus and organochlorine pesticides, arsenic barium, selenium and mercury. All these contaminants have documented exceedances of RSLs for SSL.

Source 2 - Petroleum stained area on pervious soil beneath the newly constructed pole barn. The stained area had a definitive petroleum like odor.

The exposed pervious soil at these locations may pose a potential threat to the public through direct exposure and given that the soil concentrations exceed leachability criteria may pose a potential threat to the environment and ecological aspects of the surrounding habitat.

3.1.4 Site 4 Grounds and Landscaping Equipment Maintenance Building

Source - Operations within and around the landscaping equipment maintenance building may be a potential source. The known soil contaminants exceeded RSL SSL screening criteria for SVOCs, arsenic, barium, selenium and mercury.

The exposed pervious soil at this location may pose a potential threat to the public through direct exposure and given that the soil concentrations exceed leachability criteria may pose a potential threat to the environment and ecological aspects of the surrounding habitat.

3.1.5 Site 5 Emergency Generator Building

Source 1 - Operations within and around the Emergency Generator Building may be a potential source. The known soil contaminants exceeded RSL SSL screening criteria for SVOCs, arsenic, barium, cadmium, selenium and mercury.

Source 2 - The gasoline/diesel pump located on pervious soil may be a potential source. 3E observed existing petroleum odor stained area around fuel pump on pervious soil.

The exposed pervious soil at these locations may pose a potential threat to the public through direct exposure and given that the soil concentrations exceed leachability criteria may pose a potential threat to the environment and ecological aspects of the surrounding habitat.

3.1.6 Site 6 Wastewater Treatment Plant

Source 1 - Operations within and around the wastewater treatment plant pump building may be a potential source. The known soil contaminants exceeded RSL SSL screening criteria for SVOCs, silver, arsenic, barium, selenium and mercury.

Source 2-The potential source of contamination exists around the unlabeled 55-gallon drums located 300 feet east of the waste water treatment plant pump building. 3E observed the rusted 55-gallon drums were in poor shape and contained liquid.

The exposed pervious soil at these locations may pose a potential threat to the public through direct exposure and given that the soil concentrations exceed leachability criteria may pose a potential threat to the environment and ecological aspects of the surrounding habitat.

3.1.7 SITE 7 DEBRIS LANDFILL

Source - Operations of the debris landfill may be a potential source. The known soil contaminants exceeded RSL SSL screening criteria for the pesticide dieldrin, polychlorinated biphenyls (PCBs), SVOCs, arsenic, barium, selenium and mercury.

The exposed pervious soil at this site may pose a potential threat to the public through direct exposure and given that the soil concentrations exceed leachability criteria may pose a potential threat to the environment and ecological aspects of the surrounding habitat.

4.0 LIMITATIONS

4.1 Specific Limitations

The following provides specific project limitations that should be considered upon review of the data, conclusions, and recommendations provided herein:

- Documents provided by the NPS contained information that is accurate and reliable.
- Partially buried drums were observed at Site 6. Excavation or other types of intrusive explorations to identify the amount of fully buried unmarked 55-gallon drums or their contents was beyond the scope of this project.
- Appendices from the Level 1 Report were missing including; site location maps, database report, historical aerial maps and survey maps.
- 3E could not visually assess the complete site due to heavily vegetated areas.
- No other visual survey was completed at any of the resort rooms. The conclusions and recommendations provided herein are based on analytical data collected by others. 3E cannot verify compliance with state and federal sample collection procedures and cannot guarantee the validity of the data provided by others.
- Opinions regarding regulatory applicability are based on 3E's knowledge of the regulations, experience with similar projects, and standard industry practices. Consultation with legal or regulatory officials was not included within the scope of this project.

5.0 CONCLUSIONS AND RECOMMENDATIONS

On the basis of the evaluation conducted and the factors outlined in 40 CFR 300.410, 3E has determined that the release of hazardous substances at the Site pose a potential threat to public health, welfare, and the environment and that a non-time-critical removal action should be initiated to fully assess the impacts and abate/contain the release of hazardous substances off-Site at the following locations:

- Site 1 Engineering and Maintenance Area
- Site 2 Engineering Area Former UST
- Site 3 Grounds and Landscaping Chemical Storage Sheds
- Site 4 Grounds and Landscaping Equipment Maintenance Building
- Site 5 Emergency Generator Building
- Site 6 Wastewater Treatment Plant
- Site 7 Debris Landfill

A removal action comprised of delineation of soil and groundwater contamination in these areas at the Site is necessary to address potential migration of contaminated soil and groundwater off-Site; abate the potential threat to public safety; and ensure the long-term success and protectiveness of the Site.

6.0 REFERENCES

September 1983, Lease Agreement from CBIA to VIIS.

April 22, 2016, VIIS RUE Briefing Statement Document from Bill Stevens, Chief, SER Commercial Services Program

July 15, 2009, Statement from Acting Deputy Director Support Services, NPS before the subcommittee on National Parks of the Senate Committee on Energy and Nature Resources on HR714 Virgin Islands-Caneel Bay Lease.

October 2, 2014 EPA Envirofacts Internet Search; Caneel Bay and Turtle Resort PW Violation Report.

October 2, 2014 EPA Envirofacts Internet Search; Caneel Bay Wastewater Report.

Undated and unknown authored statement from after Spring 2012 regarding Water and Wastewater issues at Caneel Bay.

August 27, 2014, Caneel Bay Summary from a teleconference between Brian Cook (NPS), Peter Fondry (DOI SER), Lars Hanslin (attorney to NPS), Shawn Mulligan (NPS Attorney) and Joe Pendry (NPS).

January 5, 2010, 111th Congress Act to lease certain lands in the US Virgin Islands-Caneel Bay Legislation.

September 4, 2014 VIIS Caneel Bay Resort Level 1 ESA report by Barksdale and Associates, Inc. Pensacola, Florida.

March 4, 2014 VIIS Caneel Bay Resort Level 2 ESA Report by Barksdale and Associates, Inc. Pensacola, Florida.

FIGURES

3E Consultants

National Park Service
Caneel Bay Resort
St. John, USVI

Legend

Caneel Bay Resort

Site Location Map

Note:
All locations approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

1395-015

DES:	REV:
DRN: ATT	
DATE: 10/6/2016	

FIGURE 1

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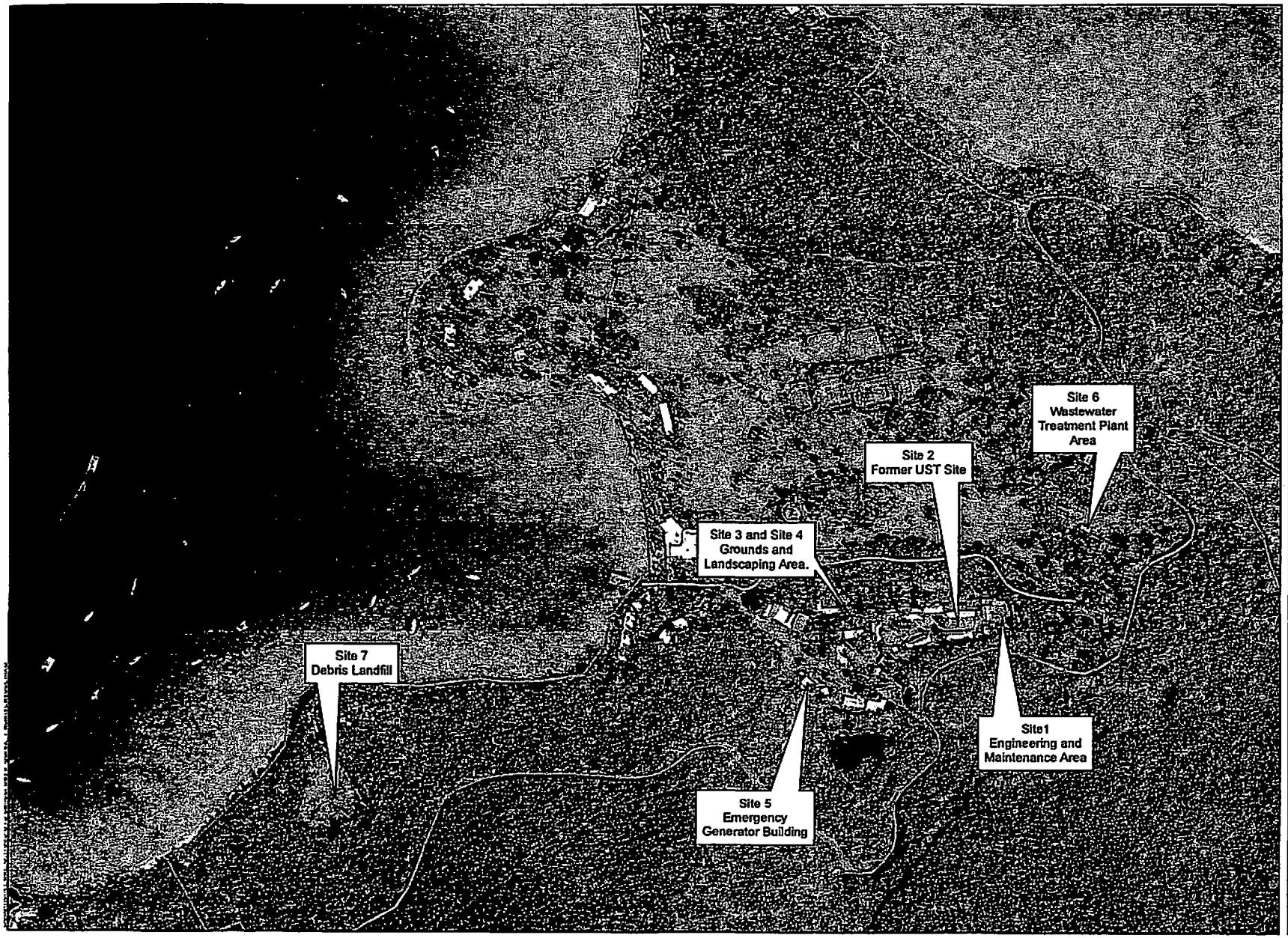

3E Consultants

Legend

- Concrete ditch
- Caneel Bay Resort

N

0 130 260 520 Feet

Note:
All locations are approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Facility Layout

National Park Service
Caneel Bay Resort
St. John, USVI

1395-015

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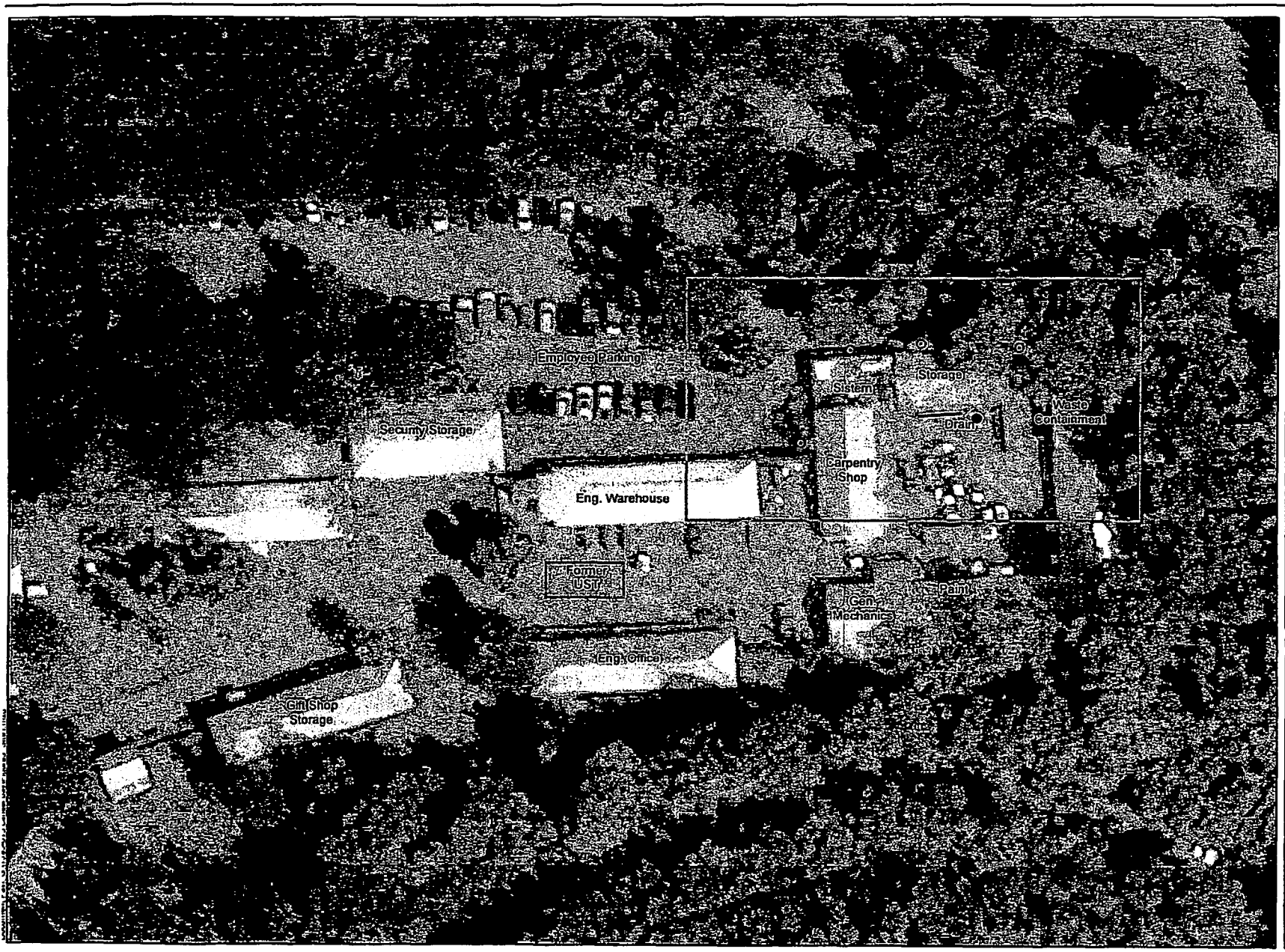
DRN: ATT	
DATE: 10/6/2016	

FIGURE 2



3E Consultants

Legend

- Previous Soil Sample Location that Exceed Soil Screening Criteria
- Site

N

0 15 30 60 Feet

Note:
All Locations are approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Site 1 Engineering and Maintenance Area

National Park Service
Caneel Bay Resort
St. John, USVI

1395-015

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DRN: ATT	
DATE: 10/7/2016	

FIGURE 3

3E Consultants

Legend

- MonitoringWell
- Previous Soil Sample Location Did Not Exceed Soil Screening Criteria
- Previous Soil Sample Location Exceeded Soil Screening Criteria
- Ground Water Flow
- Site

N

0 10 20 40 Feet

Note:
All Locations are Approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Site 2
Engineering Area
Former UST

National Park Service
Caneel Bay Resort
St. John, USVI

1395-015

DES:	REV:
DRN: ATT	
DATE: 10/7/2016	

FIGURE 4

3E Consultants

Legend

- Previous Soil Sample Location that Exceed Soil Screening Criteria
- Site

N

0 20 40 80 Feet

Note:
All Locations Are Approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Site 3
Grounds and Landscaping Chemical Storage Sheds

National Park Service
Caneel Bay Resort
St. John, USVI

1395-015

DES:	REV:
DRN: ATT	
DATE: 10/7/2016	

FIGURE 5

Document Path: G:\1395-015 caneel bay\Figure5_site3.mxd

3E Consultants

Legend

- Previous Soil Sample Location that Exceed Soil Screening Criteria
- Site

N

0 10 20 40 Feet

Note:
All Locations are Approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Site 4
Grounds and Landscaping Equipment Maintenance Building

National Park Service
Caneel Bay Resort
St. John, USVI

1395-015

DES:	REV:
DRN: ATT	
DATE: 10/7/2016	

FIGURE 6

Document Path: G:\1395-015 caneel bay\mxd\ Site4.mxd

3E Consultants

Legend

- Previous Soil Sample Location that Exceed Soil Screening Criteria
- Site
- Surface Water Flow

N

0 10 20 40 Feet

Note:
All Locations are Approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Site 5
Emergency Generator Building

National Park Service
Caneel Bay Resort
St. John, USVI

1395-015

DES:	REV:
DRN: ATT	
DATE: 10/10/2016	

FIGURE 7

3E Consultants

Legend

- Previous Soil Sample Location that Exceed Soil Screening Criteria
- Site

0 20 40 80 Feet

Note:
All Locations are Approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

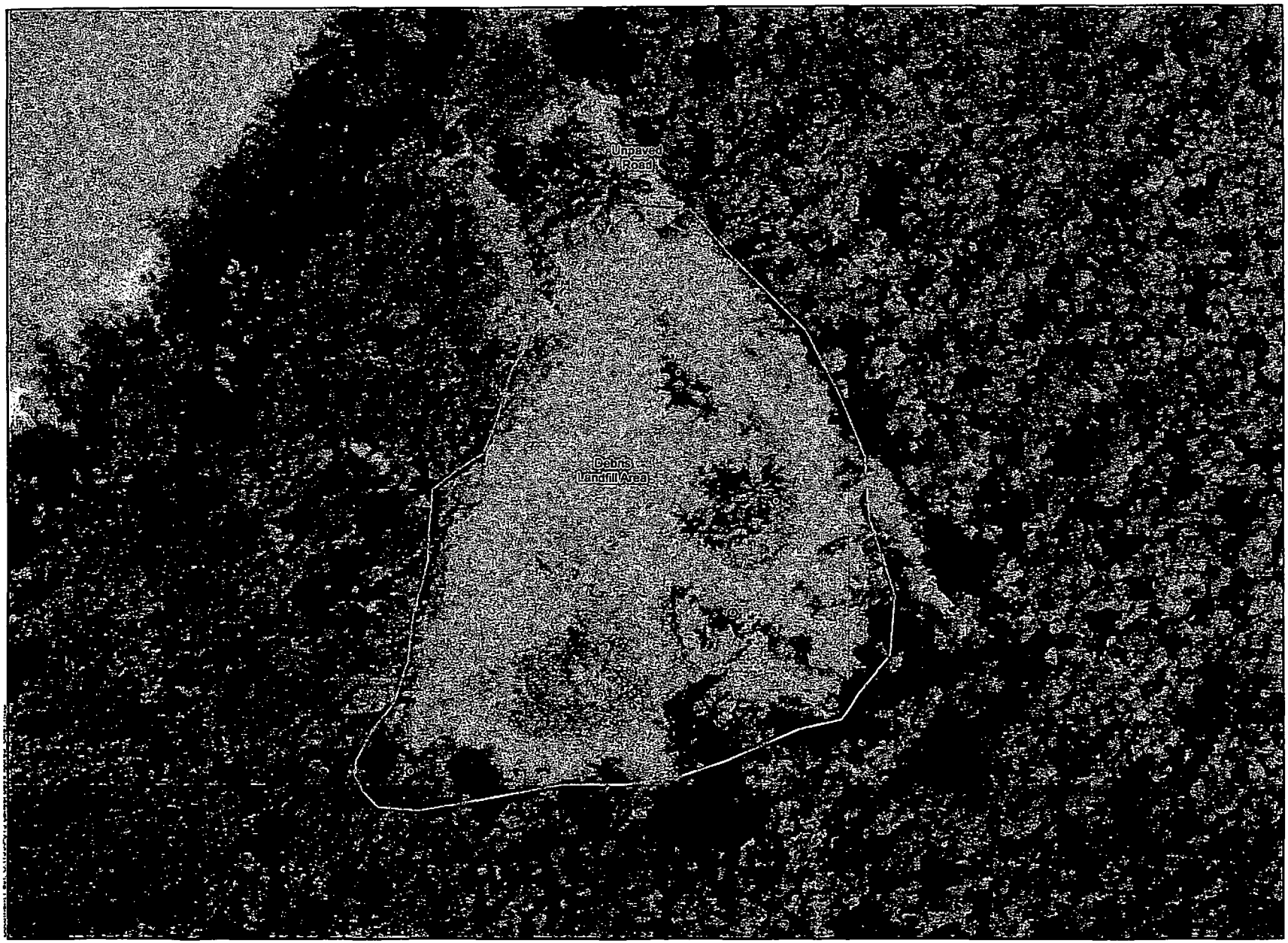
Site 6
Wastewater Treatment Plant

National Park Service
Caneel Bay Resort
St. John, USVI

1395-015

DES:	REV:
DRN: ATT	
DATE: 10/7/2016	

FIGURE 8



3E Consultants

Legend

- Previous Soil Sample Location that Exceed Soil Screening Criteria
- Site

0 20 40 80 Feet

Note:
All Locations are Approximate

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Site 7
Debris Landfill

National Park Service
Caneel Bay Resort
St. John, USVI

1395-015

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DRN: ATT	
DATE: 10/7/2016	

FIGURE 9

GeoSearch
On time. On target. In touch.™

Historical Aerial Photographs

http://www.geo-search.net/QuickMap/index.htm?DataID=Standard0000156722
Click on link above to access the map and satellite view of current property

Target Property:

Caneel Bay Resort St. John, USVI 00831-720
Monroe County, Florida 33037

Prepared For:

3E Consultants, Inc.

Order #: 72970
Job #: 156722
Project #: 1395-015
Date: 08/05/2016

phone: 888-396-0042 · fax: 512-472-9967 · www.geo-search.com

TARGET PROPERTY SUMMARY

Caneel Bay Resort St. John, USVI 00831-720
Monroe County, Florida 33037

USGS Quadrangle: ***Garden Cove, FL***
Target Property Geometry: ***Point***

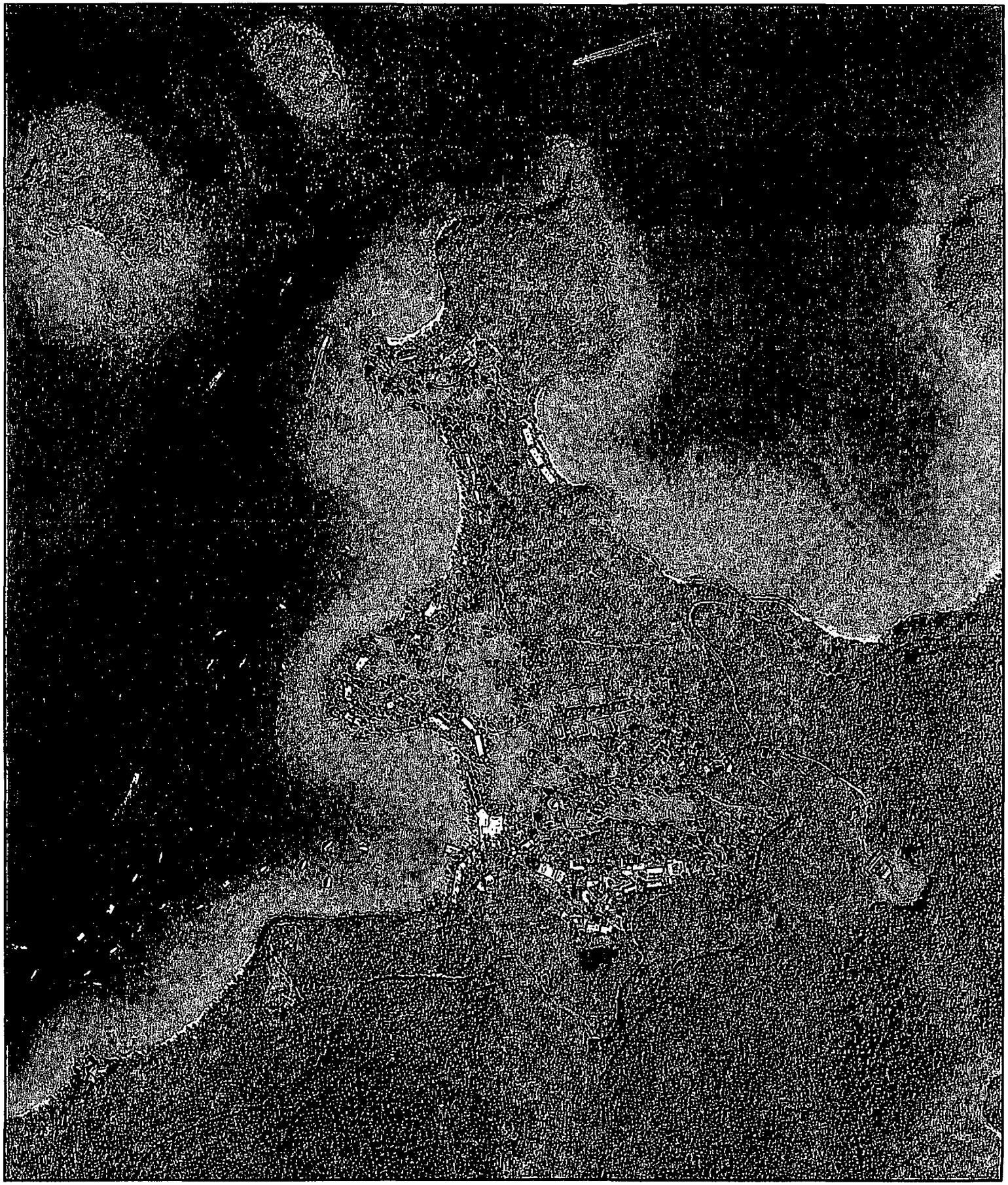
Target Property Longitude(s)/Latitude(s):
(-80.327911, 25.240969)

County/Parish Covered:
Monroe (FL)

Zipcode(s) Covered:
Key Largo FL: 33037

State(s) Covered:
FL

****Target property is located in Radon Zone 3.***
Zone 3 areas have a predicted average indoor radon screening level less than 2 pCi/L (picocuries per liter).

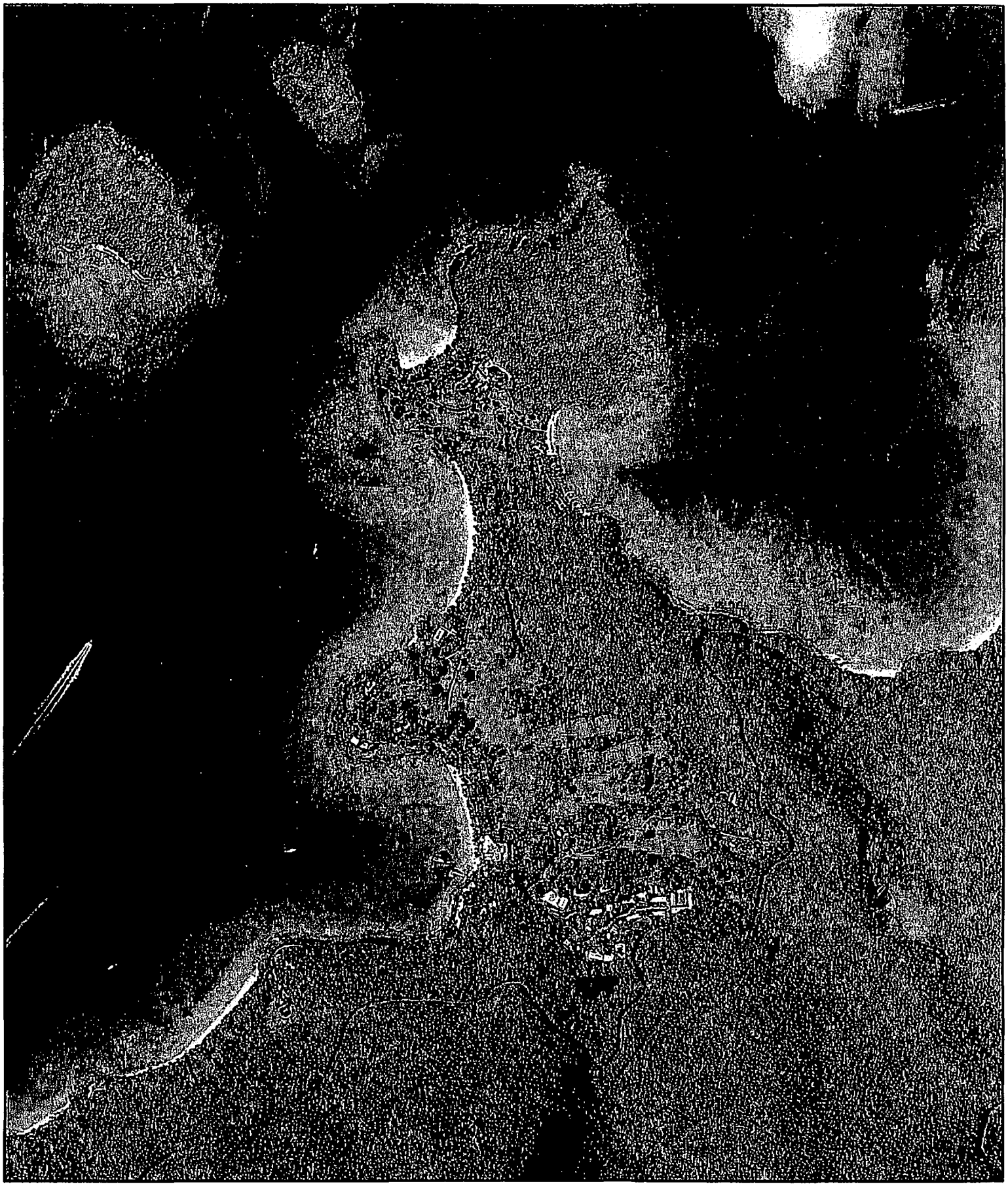


N
W E
S

JOB #: 156722 - 8/5/2016

SITE: *CANEEL BAY RESORT ST. JOHN, USVI 00831-720*
SOURCE: *USACE*
DATE: *2011*
COUNTY: *ST JOHNS, VI*
SCALE: *1" = 700'*

GeoSearch



N
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JOB #: 156722 - 8/5/2016

SITE: *CANEEL BAY RESORT ST. JOHN, USVI 00831-720*
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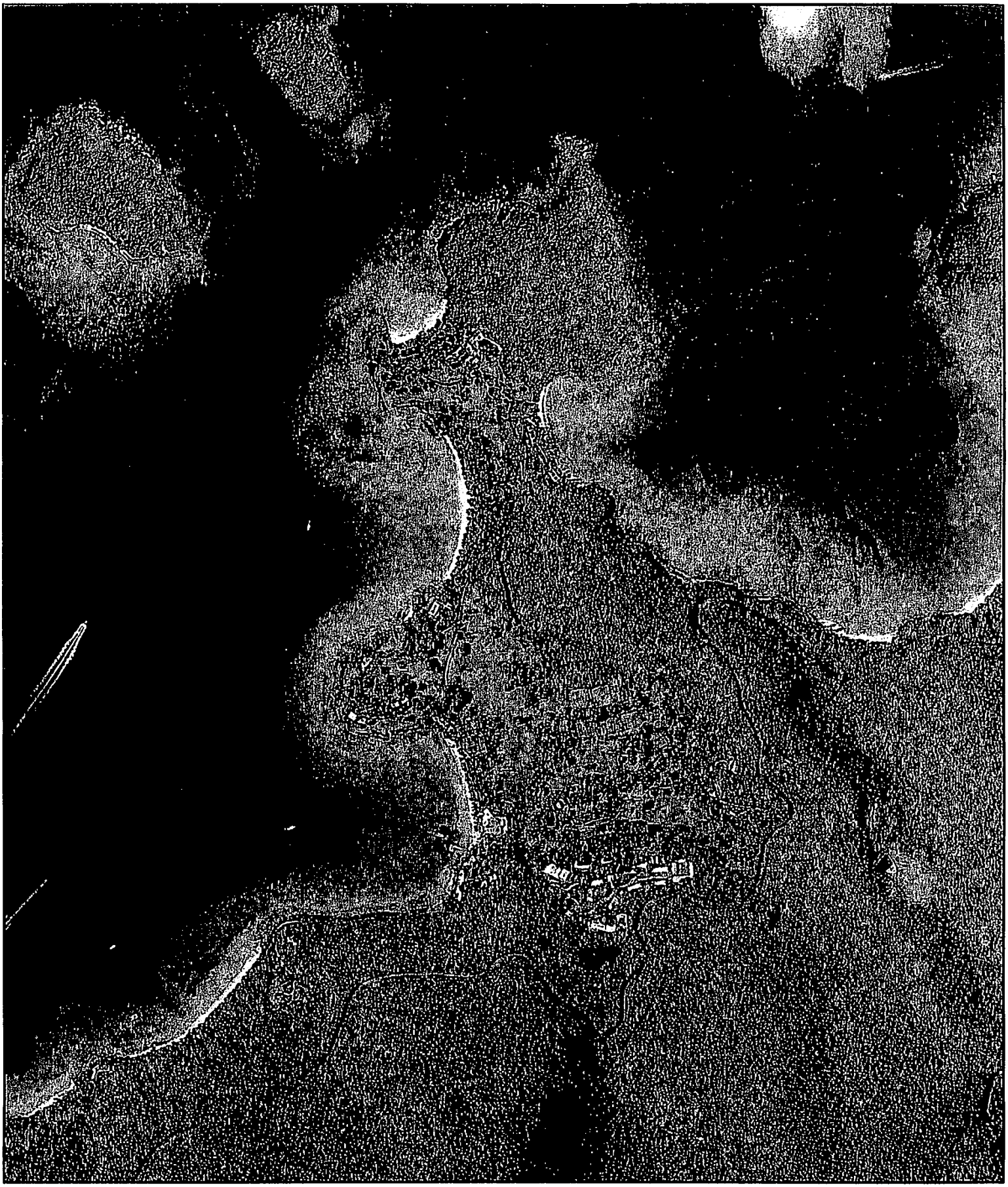
DATE: *2007*
COUNTY: *ST JOHNS, VI*
SCALE: *1" = 700'*

GeoSearch



N
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JOB #: 156722 - 8/5/2016

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SOURCE: *USACE*
DATE: *11/01/2006*
COUNTY: *ST JOHNS, VI*
SCALE: *1" = 700'*

GeoSearch

N
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S

JOB #: 156722 - 8/5/2016

SITE: *CANEEL BAY RESORT ST. JOHN, USVI 00831-720*
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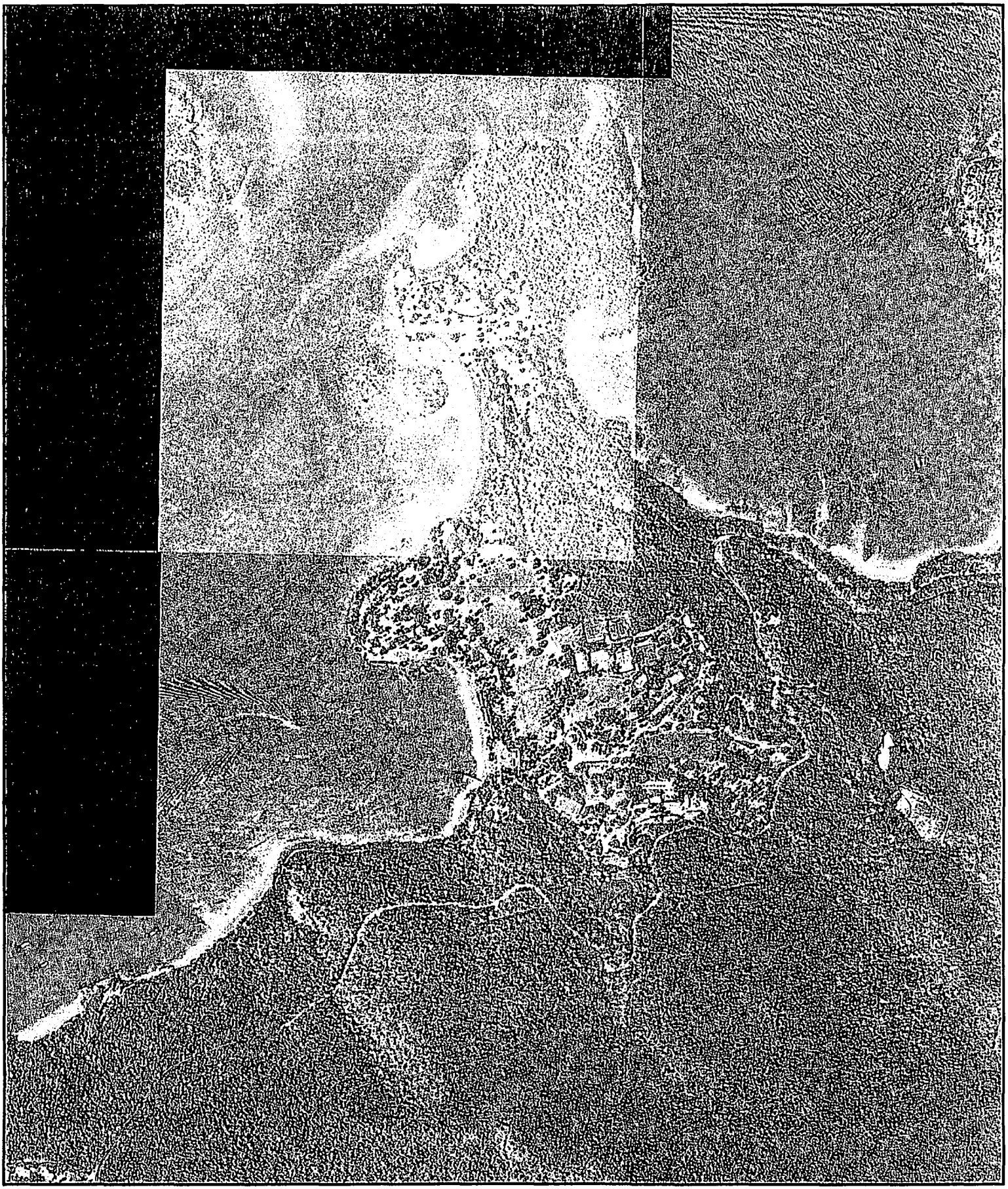
COUNTY: *ST JOHNS, VI*
SCALE: *1" = 700'*

GeoSearch



N
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JOB #: 156722 - 8/5/2016

SITE: *CANEEL BAY RESORT ST. JOHN, USVI 00831-720*
SOURCE: *USGS*
DATE: *1999*
COUNTY: *ST JOHNS, VI*
SCALE: *1" = 700'*

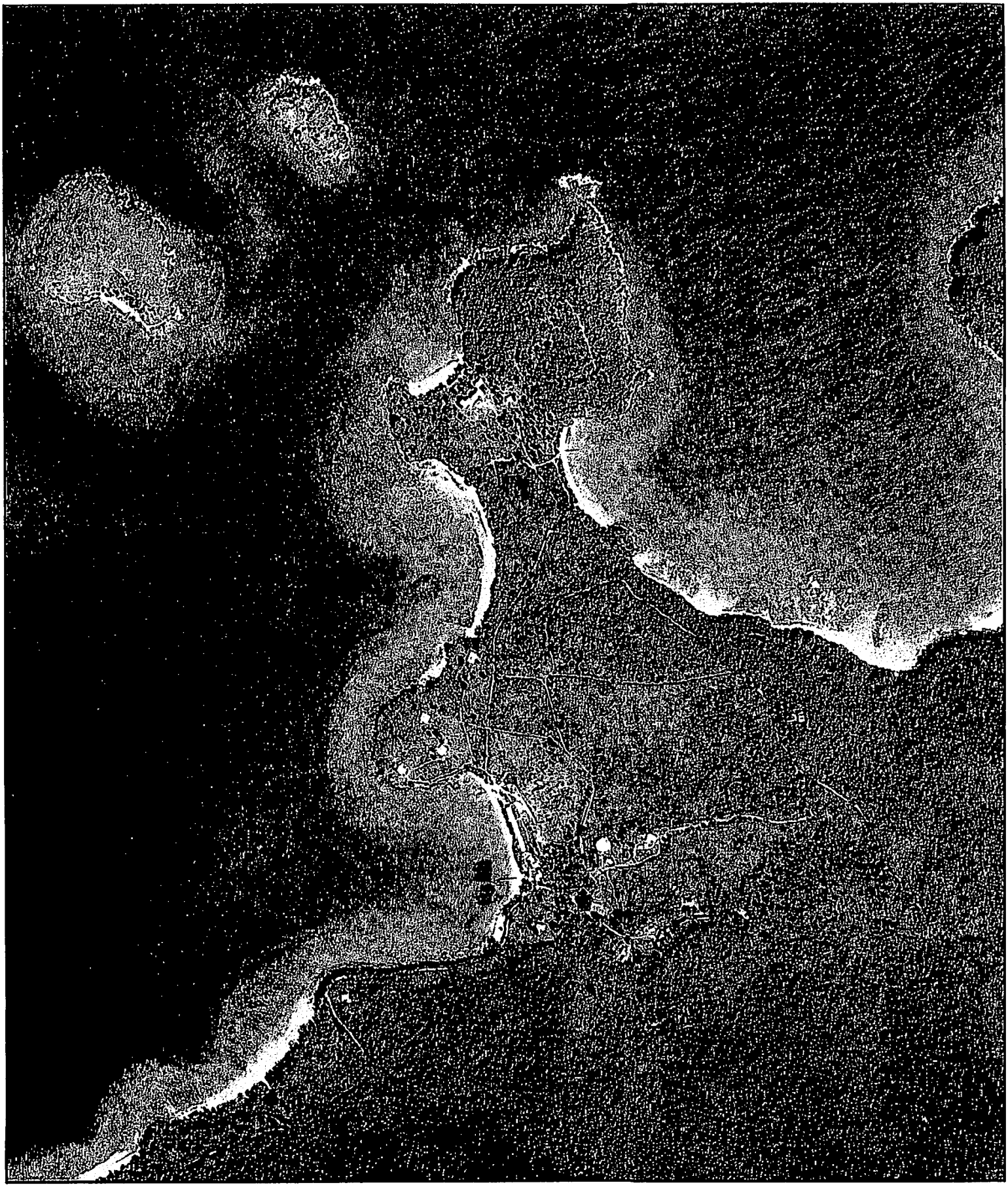
GeoSearch

N
W E
S

JOB #: 156722 - 8/5/2016

SITE: *CANEEL BAY RESORT ST. JOHN, USVI 00831-720*
SOURCE: *NPS*
DATE: *02/08/1983*
COUNTY: *ST JOHNS, VI*
SCALE: *1" = 700'*

GeoSearch



N
W E
S

JOB #: 156722 - 8/5/2016

SITE: *CANEEL BAY RESORT ST. JOHN, USVI 00831-720*
SOURCE: *USGS*
DATE: *01/28/1954*
COUNTY: *ST JOHNS, VI*
SCALE: *1" = 700'*

GeoSearch

APPENDIX C

2016 Site Photographs

3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
1	09/08/16

Description:

View looking northeast at monitoring well MW-1 at Site 2 Former UST Site.

Photo:	Date:
2	09/08/16

Description:

View looking west at concrete patch at Site 2 Former UST Site.

3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
3	09/08/16

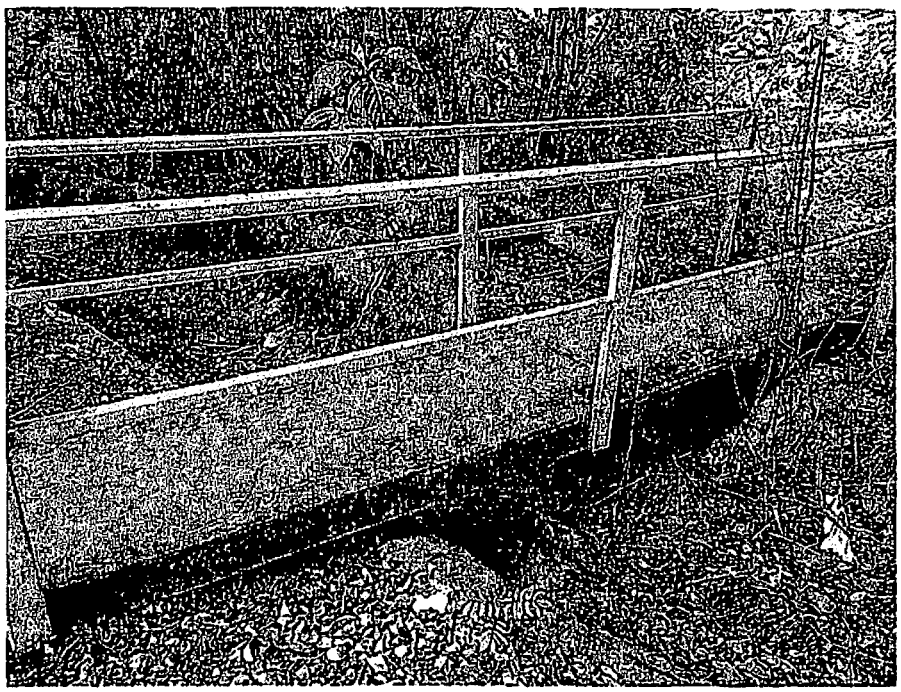
Description:

View looking east at concrete stormwater ditch north of Site 1 Engineering and Maintenance Area.

Photo:	Date:
4	09/08/16

Description:

View looking west at concrete stormwater ditch north of Site 1 Engineering and Maintenance Area.



3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
5	09/08/16

Description:

View looking south at petroleum stained area at Site 3 Grounds and Landscaping Chemical Storage Sheds.

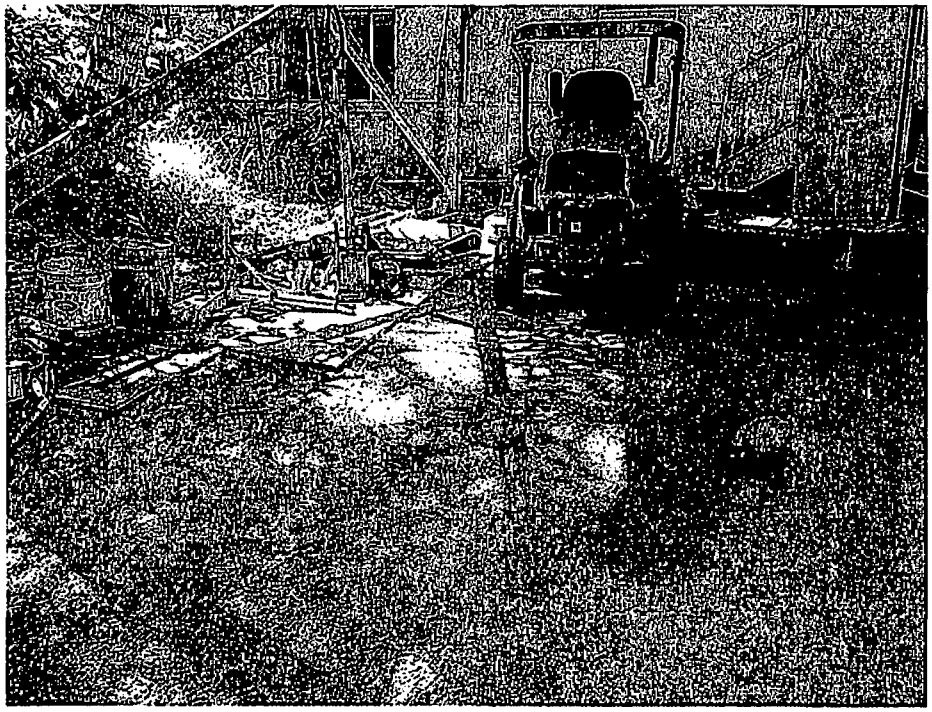


Photo:	Date:
6	09/08/16

Description:

View looking south at storage within Site 3 Grounds and Landscaping Chemical Storage Sheds.

3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
7	09/08/16

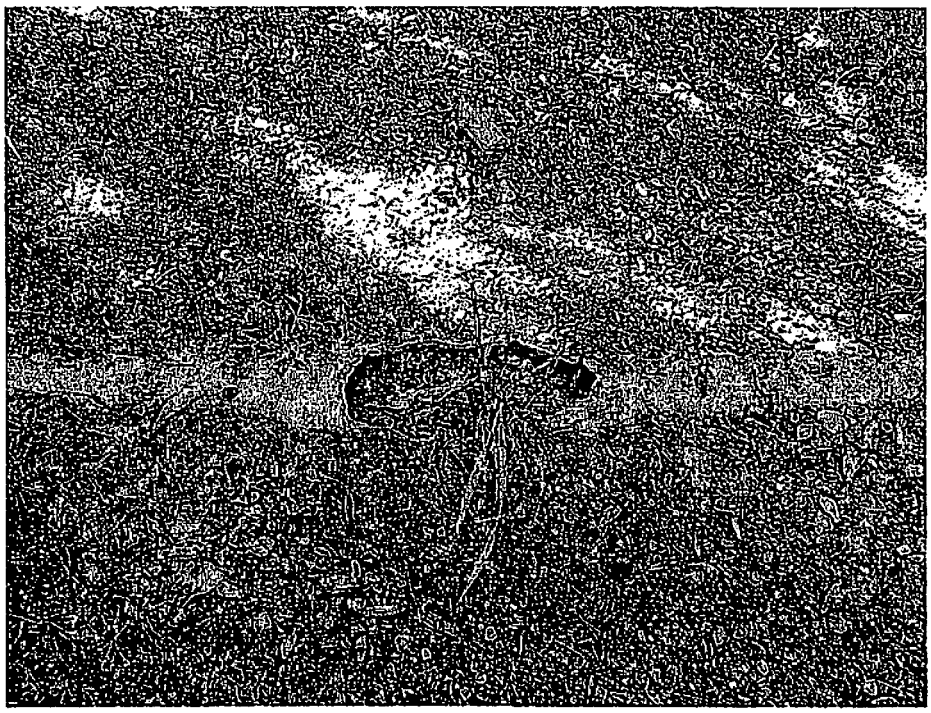
Description:

View looking north at Site 4 Grounds and Landscaping Equipment Maintenance Building open storage of equipment and supplies.

Photo:	Date:
8	09/08/16

Description:

View looking south at exposed asbestos pipe through Greenhouse at Site 5 Grounds and Landscaping Chemical Storage Sheds.



3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
9	09/08/16

Description:

View looking west through Greenhouse at Site 5 Grounds and Landscaping Chemical Storage Sheds.

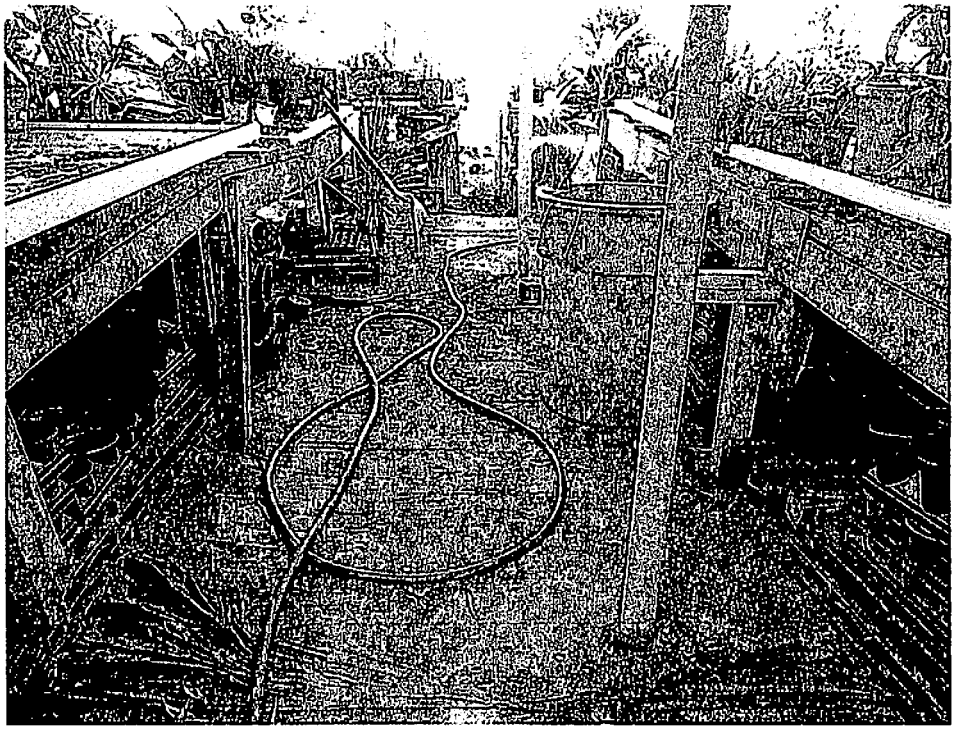


Photo:	Date:
10	09/08/16

Description:

View looking east at wastewater pump building Site 6 Wastewater Treatment Area.

3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
11	09/08/16

Description:

View looking east at unlabeled and partially buried 55-gallon drums near Site 6 Wastewater Treatment Area.

Photo:	Date:
12	09/08/16

Description:

View looking east at unlabeled and partially buried 55-gallon drums near Site 6 Wastewater Treatment Area.

3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
13	09/08/16

Description:

View looking east at unlabeled 55-gallon drums near Site 6 Wastewater Treatment Area.

Photo:	Date:
14	09/08/16

Description:

View looking west at palm tree cuttings within Site 7-Debris Landfill.

3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
15	09/08/16

Description:

View Looking east at layered debris within Site 7-Debris Landfill.

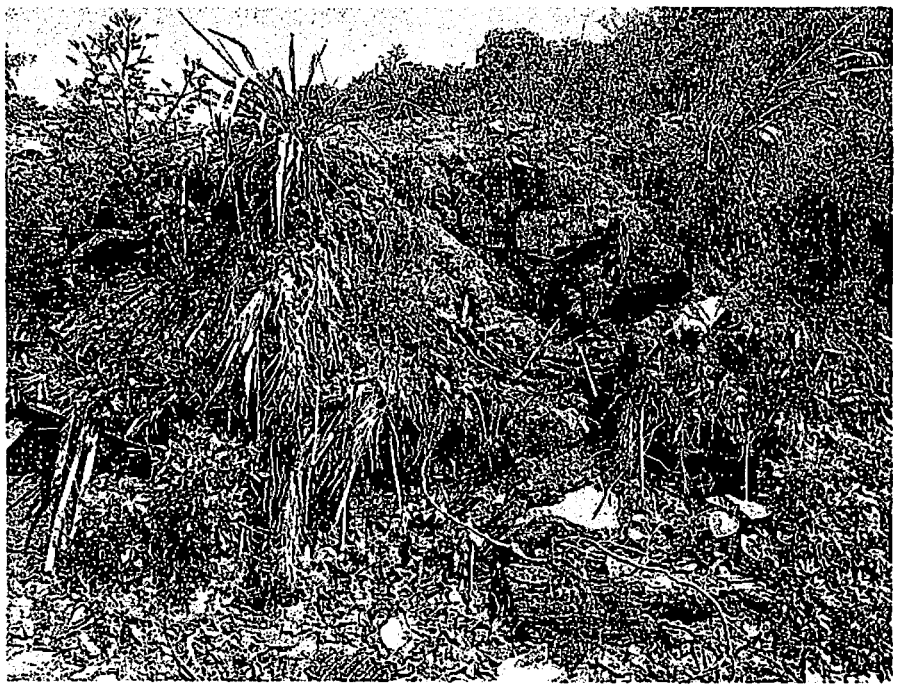


Photo:	Date:
16	09/08/16

Description:

View looking north at waste containment area within Site 1-Engineering and Maintenance Are/a.

3E Consultants

Photographic Log

Client Name:	Project Name:	Project Location:	3E Project No.:
National Park Service	RSE Caneel Bay Resort	St. John, USVI	1395-015

Photo:	Date:
17	09/09/16

Description:

View looking west at a fuel pump on pervious soil at Site 5 Emergency Generator Building.

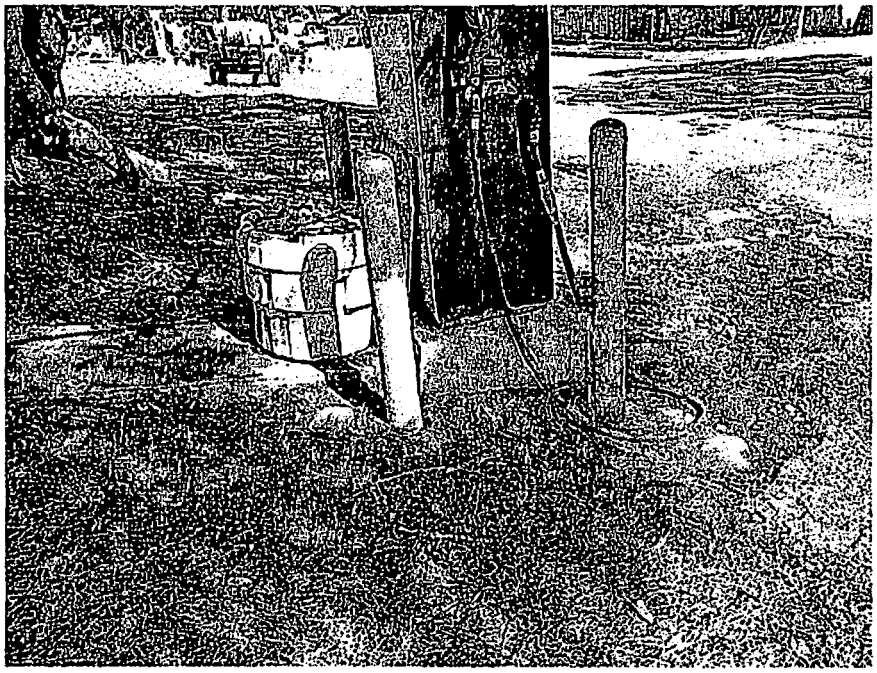


Photo:	Date:
18	09/08/16

Description:

View looking at surface flow north of fuel pump on at Site 5 Emergency Generator Building.