EE/CA Addendum Presentation Recording

0:0:0.0 --> 0:0:1.450
Kachurak, Kelly R
And we're ready to begin.

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Fields, Nigel
Good day everyone. My name is Nigel Fields. I'm the Superintendent here at Virgin Islands National Park in Virgin Islands. Coral Reef National Monument today. This is a pre-recording of the Caneel Bay Engineering evaluation and cuffs analysis addendum. Community learning session. So we're gonna focus in on what we are doing with the environmental investigation, how we've extended it from what we did last year. We'll provide an update on where we are, the findings that we've.

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Fields, Nigel
What we have and how the public can learn where the documents are to review and how you can present your comment during our public comment period that's open now we can go to the next slide.

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Fields, Nigel
So again, my name is Nigel feels and the Superintendent here at the park and with me, it's Kelly Kachurak. She's in US. Public Health. Officer Kelly, would you like to introduce yourself?

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Kachurak, Kelly R
Sure. Thank you, Nigel, and good day everyone. I'm Kelly Kachurak. I'm Lieutenant Commander in the US Public Health Service. I work with the South Atlantic Gulf region, where I manage the sustainability, environmental and accessibility program. As part of that role, I've been the project manager for the Caneel Bay Environmental work.

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Fields, Nigel
Fantastic.

0:1:16.240 --> 0:1:16.840
Kachurak, Kelly R
Thank you, Nigel.

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Fields, Nigel
Thank you for joining us, Kelly. So we can advance to a couple of slides here.

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Fields, Nigel
So our purpose today is just to review what the environmental investigation is and why we're doing it. We want to describe what the engineering evaluation and cost analysis addendum is, provide an overview of the findings that we have in this ECA addendum, and also importantly, to share with our

recommended actions are. We want to demonstrate where you can find more information and how you can comment on the findings of this EE/CA..

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Fields, Nigel
Addendum report.

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Fields, Nigel
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Fields, Nigel
So what is an EE/CA anyway? What is an engineering evaluation and cost analysis? So we began this EE/CA process back in 2001. Just last year. It is a scientific databased process under the Comprehensive Environmental Response, Compensation and Liability Act. But many people know as the Super Fund debt, our goal is to understand what environmental contamination might be in the environment, the nature and the extent of that contamination and understand what risks…

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Fields, Nigel
they may pose to human health and the environment. Our goal is to remove those risks to get removal goals associated with any contamination, and to come up with a removal action. All of this is culminated into an Action Memorandum that we present to the public at the end of the process after we've received public comments.

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Fields, Nigel
Importantly, we want to make sure it's clear that this EE/CA addendum, this extension of the investigation from last year, does not replace what was done previously. It addresses some of the data gaps that were that were identified when we did the eco last year. So this supplements and helps clarify information from last year's report. And our goal is to complete this investigation, make the appropriate environmental recommendations and now offer the public the opportunity to provide any comment.

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Fields, Nigel
On what we've done thus far.

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Fields, Nigel
Next slide.

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Fields, Nigel

So stepping back, how do we get here? You may recall that the first environmental site assessment was done back in 2012. This was a part of a potential lease action that was taking place over 10 years ago as a typical part of a type of action like that, the goal is just to survey the landscape, to see if there's any environmental concerns. Visually, there's anything that's obvious. There were some concerns that were identified at the time in 2012. And so as a phase two site assessment was conducted in 2013.

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Fields, Nigel
The goal was to then refine where those areas of concern were and back in 2016 and results came out in 2017. The targeted area was much more defined. It was confirmed that there were some site contamination and specific areas of Caneel, and then the Hurricanes hit, two Category 5 storms Irma, and Maria,

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Fields, Nigel
Wreck havoc on the island and also close the resort. Since then dealing with access issues and other things it's been it took us a while to get back started again but back in 2021 we launched the first round of sampling under this EE/CA and we presented those results to the public last June. We then issued an action memorandum on the things that we found back in October of 2021.

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Fields, Nigel
But with that, we identified some data gaps, some things that we missed, things that we still were concerned about that we needed to go back and collect more information on, which is what we did with another rounding sampling in November of 2021 and then followed up with our final round of sampling in January of this year. So that all the samples were analyzed and verified by certified laboratory and we used the results of those data to conduct ecological and human health risk assessment.

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Fields, Nigel
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Fields, Nigel
So I'll turn it over to Kelly Kachurak, who can walk us through what was done last year and also provide us an update on where we are today. Kelly.

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Kachurak, Kelly R
Thank you, Nigel. So here, (map of St. John showing location of Caneel Bay Resort on slide) I think most of you are familiar, but in case you're not, we see the Caneel Bay and it's portion on Saint John in the Virgin Islands. So, the Resort is located on that northwestern portion of the island. You can see there are three areas labeled area one, two, and three that were the focus of the original EE/CA completed in 2021, again at EE/CA is an engineering evaluation and cost analysis.

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Kachurak, Kelly R
And then we didn't find anything of concern in Area 1.

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Kachurak, Kelly R
And here we can see the areas that are investigated in the 2022 ECA addendum work. This includes things like the underground storage tank at Cottage 7 and which is circled in a bright magenta. It's kind of on the western portion of the resort, the fuel dispenser, which is near area two, where the fueling station is, there's also some green squares kind of rectangles throughout the site that shows where we, took additional background decision units

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Kachurak, Kelly R
to sample. I'll explain those later. There is some work done at the catchment basin or on the east side of the resort and across North Shore Rd.

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Kachurak, Kelly R
And then we did some lead and asbestos testing, which I'll show you on the next slide. And so here is the northern portion of the resort. You can see the orange circles are asbestos containing material samples where those were taken and the yellow squares are where we took lead based paint samples. Again, this is where we took the samples, not necessarily where we found those materials.

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Kachurak, Kelly R
And then on the second side, it's more of the same. So we have the blue rectangles are buildings. The orange circles are still where asbestos samples were taken and the yellow squares are where lead based paint samples were taken. We did some initial sampling to see where lead and asbestos were in the EE/CA. So we knew that some buildings had no indications of these materials. So we didn't need to go back to them and the addendum.

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Kachurak, Kelly R
So went down after investigated, there were eight total data gaps that were identified in the 2021 EE/CA report. We addressed each of those in this EE/CA addendum. So first, we looked at the asbestos containing material and

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Kachurak, Kelly R
Lead based paint. We looked into the underground storage tank at Cottage #7, the petroleum and soil at Area 2 monitoring well, number one, catchment basin. There was a buried item noted.

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Kachurak, Kelly R
An arsenic background level for the site was established and then looking at groundwater, potential contamination pathway and just as a reminder, we looked at these things, just test the nature and

extent of contamination on the site and to then assess if there are any risk to human health or the environment.

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Kachurak, Kelly R
OK.

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Kachurak, Kelly R
That is fine.

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Kachurak, Kelly R
OK, So what did we find first? Asbestos, we found there were various asbestos containing materials on the site. We only looked at buildings that were missing a wall or roof when it came to asbestos because they were then open to the environment.

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Kachurak, Kelly R
More on that later, but generally it was most prevalent in roofing materials. There is some pipe pieces both above ground and buried that have asbestos.

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Kachurak, Kelly R
And the few various other smaller items such as floor tiles, glue dots and joint compound.

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Kachurak, Kelly R
Yet, we did not note any asbestos on site that is currently friable, friable means it can be crushed by hand, which is when those fibers can be released into the air.

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Kachurak, Kelly R
In terms of uh, we did find lead-based paint at one column inside one building. There might be similar paint on the structures or structural columns and similar buildings in the area, but that column was relatively interior, more the center of the building and not near the exterior. That's around it by concrete floor.

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Kachurak, Kelly R
The underground storage tank at cottage seven was confirmed to exist and confirmed that it had been pumped empty. So there's no concern about that potentially leaking. It is empty.

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Kachurak, Kelly R
The petroleum and soil we took additional samples of the soil, evaluated it for the contaminants related to petroleum, and found that there are very low levels, that are below the action levels that's necessary to address.

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Kachurak, Kelly R
Umm, there's the latter half of the findings for the monitoring. Well, number one, the EE/CA report in 2021 had recommended to close that well, which we did. It had provided a possibility for taking surface water and contaminating underground water should the surface waters be contaminated. So we went ahead and closed that to remove that as a potential threat.

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Kachurak, Kelly R
At the catchment basin, you can see in the picture here there's a group doing ground penetrating radar. That's where you run items over and basically tells you what's buried below. This is where there was an unknown buried item. We were able to uncover it and find there. It's just a massive concrete and potentially waste concrete from other work that was done. The concrete is not an environmental hazard.

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Kachurak, Kelly R
For the arsenic background level, we took additional samples from around the resort, in areas that we thought hadn't been disturbed necessarily, where they still had the virgin soils there and the contractor took samples at a potential fill source. You want to make sure that you're prescribing recommendations for cleaning up arsenic relative to the natural arsenic levels in the soil. So what we found is that the arsenic levels in the soil at the resort match the background levels for the island.

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Kachurak, Kelly R
And then for groundwater, we didn't find any evidence to support groundwater being contamination pathway. We had installed several drills, sorry, several water wells back in 2021. We went back to resample those. There's other wells that were preexisting on the resort, we were able to get some small samples, but noted that those wells did not naturally reach charge overnight. The biggest concern for groundwater is as a drinking water source given the very low volumes

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Kachurak, Kelly R
and minimal recharge. We know that that's not a viable issue. So we were able to rule out groundwater is the contamination pathway.

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Kachurak, Kelly R
So with all of those findings, what do we recommend, the recommendation at this time, is to remove the debris containing asbestos, so this includes the loose pieces of asbestos containing pipe,

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Kachurak, Kelly R
And then other like loose roof materials and other materials that contain asbestos that are kind of strewn about this site at this time.

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Kachurak, Kelly R
That estimated cost is around $500,000.

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Kachurak, Kelly R
Uh, for the remaining asbestos, we recommend that the resort operator considers what steps are appropriate to address any lead-based paint that is present and asbestos containing material that remains on property.

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Kachurak, Kelly R
Umm, just a quick aside on the approach to asbestos containing materials, the

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Kachurak, Kelly R
Study focused on the items that are higher risk that uses the factors established by CERCLA and its implementing regulations. And note that CERCLA of regulates a large host of contaminants and not just the asbestos, but it does focus on those where those situations where there is an actual or potential exposure to human populations, animals or the food chain or hazardous substances or pollutants and contaminants.

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Kachurak, Kelly R
We note that weather conditions can cause hazardous substances to migrate or be released.

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Kachurak, Kelly R
And there is an availability of other propriate federal or state response mechanisms. Which should always be considered.

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Kachurak, Kelly R
As time passes, the removal of additional materials, particularly those containing asbestos, may be necessary as the situation change on the site and further degradation occurs.

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Kachurak, Kelly R
Examples of this, if a future storm event causes additional asbestos containing materials to be detached from the building or if other asbestos containing materials on the site become friable, perhaps from weathering over time.

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Kachurak, Kelly R
So there are generally two portions of the regulatory framework that are relevant to asbestos containing materials. The first is CERCLA and its implementing regulations. CERCLA applies to the release or threat of release of hazardous substances to the environment. So again, that's all hazardous substances and not just asbestos.

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Kachurak, Kelly R
And then there is the national emission standards for hazardous air pollutants, or NESHAP. And NESHAP applies to and addresses asbestos containing materials that are in and on facilities, which includes buildings and pipe networks.

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Kachurak, Kelly R
NESHAP also applies to other contaminants. I'm just attributing how it relates to asbestos here, and one important note is that it does not apply to the hurricane debris because it was not the result of human demolition or renovation.

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Kachurak, Kelly R
Nigels I'm going to hand it back over to you.

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Fields, Nigel
Thank you, Kelly. So we want to make sure that everyone knows where the documents are that are now released.

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Fields, Nigel
You can go to Park.

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Fields, Nigel
Excuse me, to our planning environment and public comment website which you can get there by going to parkplanning.nps.gov/CaneelBayAssessment.

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Fields, Nigel
There you'll find the list of the study, the tables, the figures, all the supporting documentation.

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Fields, Nigel
And that's the great place also for you to provide your public comments. Comments can be provided in the PEPC website or they can also be emailed to the VIIS_interpretation@nps.gov. Or you can also drop them off at the park visitor center.

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Fields, Nigel
Next slide.

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Fields, Nigel
So again, Umm, the full report as well as the uh supporting administrative record are all available on the website. You can also view if you want to see a hard copy of the report. The hard copy is available here

for viewing at the Park Service visitor Center Monday through Friday 9:00 AM to 1:30. We don't have copies to hand print copies to hand out, but certainly anyone can come and view the copy that we have here at the visitor center.

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Fields, Nigel
Next line please.

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Fields, Nigel
We want to make sure everyone is aware that the public period started yesterday on September 13th and it goes through October 12th.

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Fields, Nigel
The public comment period can be extended by 15 days if we get a time the request, if anyone wants to make that request for an extension, you can do so by emailing the VIIS_interpretation@nps.gov and just state that you're requesting the public comment period be extended for 15 days.

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Fields, Nigel
Uh comments in PEPC or comments that you drop off at the visitor center can be posted with or without your name.

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Fields, Nigel
Next slide.

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Fields, Nigel
So we're having a community learning session on the 14th. We're also having a community listening session, excuse me and National Park Service listening session on September 27th. It's our opportunity for us, the Park Service to hear from the public on any comments that you may have regarding this EE/CA addendum. So please be aware that it will be a hybrid session, and those that are in St. John are welcome to come to the visitor center.

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Fields, Nigel
On the conference room and participate that way or by using the team site and you can participate virtually and that would be at 5:30 PM on September 27.

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Fields, Nigel
We look forward to hearing from you and receiving your comments. This is a critical part of the process is to make sure that we have the public involvement and the public engagement on the contamination and our interest in doing removal actions, so please be sure to get your comments in by October 12th. Thank you very much.

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Fields, Nigel
And thanks Kelly.