



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901
February 11, 2014

Ms. Sherry Cordova, Chairperson
The Cocopah Indian Tribe
14515 South Veterans Drive
Somerton, Arizona 85350

Subject: No Further Action ("NFA") determination for the Cocopah Vocational Training Center UST cleanup facility, located at 14250 South Avenue I Somerton, Arizona 85350 (EPA ID# COCO-003)

Dear Chairperson Cordova:

The U.S. Environmental Protection Agency ("EPA") has completed its review of file documents pertaining to the Cocopah Vocational Training Center ("CVTC") underground storage tank ("UST") cleanup site (the "Site"). Last year, Chris Prokop, of my staff, had discussions regarding the status of the Site with Ms. Barbara Mathias, former Assistant Tribal Administrator. Prior to that, Mr. Prokop had communicated with Mr. Kevin Conrad, former Director of the Tribal Environmental Protection Office ("TEPO"), regarding the Site. Based on the analytical data for residual hydrocarbons at the Site, the low probability for current and future exposures to the residual hydrocarbons, the current use of the Site and written input from the current Tribal Administrator, EPA is not requiring further action for the Site at this time. This no further action ("NFA") determination for the Site acknowledges that low level residual hydrocarbon contamination exists at the Site, and that potential future development may trigger the need for re-evaluating the Site. The sections below provide historical information about the Site, the analytical results for soil and groundwater sampling, a discussion of the potential for exposures to the residual hydrocarbons, and the justification for EPA's NFA determination for the Site.

Previous UST operations and documentation of a hydrocarbon release

The EPA UST Notification Form for the Site, signed by you on December 30, 1998, indicates that two 4,000 gallon steel USTs were installed by the Tribe in 1960 for the purpose of storing gasoline. The UST Notification Form lists the "Cocopah Indian Tribe" as the owner of the USTs, and indicates that the USTs were last used on January 10, 1980. On December 10, 1998, the two UST systems were removed by NEI Environmental ("NEI"), a contractor for the Tribe. The analytical results for the soil samples collected by NEI during the UST system removals revealed the presence of hydrocarbons.

Follow-up soil sampling to determine the extent of hydrocarbon contamination

On February 18 and August 20 of 1999, NEI drilled a total of 11 additional borings at the Site to determine the vertical and lateral extents of hydrocarbon contamination in soil. NEI collected soil samples at five foot intervals from each boring, and all of the borings extended to at least 20 feet below ground surface (bgs). At least one soil sample from seven of the 11 borings had detectable hydrocarbon concentrations, and at least one soil sample from six of the 11 borings had hydrocarbon concentrations (for at least one compound) above EPA Region 9's Regional Screening Levels ("RSLs") for residential areas. The highest benzene concentration obtained during the soil sampling was 18.0 milligrams per kilogram (mg/kg) that was found in boring B4 at 15 feet bgs. This benzene concentration exceeds the current 1.1 mg/kg residential RSL for benzene. The highest concentrations for ethylbenzene and xylenes in soil were also obtained from boring B4 at 15 feet bgs, and these concentrations exceeded the residential RSLs. Please note that EPA uses the conservative, residential RSLs for initial screening purposes. Groundwater was not encountered during these sampling events.

NEI's letter report, dated September 13, 1999, which summarized the results of the 1999 soil sampling, concluded that the extent of hydrocarbon contamination had been determined except for the northern boundary of the Site. Based on this conclusion, NEI's report recommended three additional soil borings to determine the northern extent of hydrocarbon contamination.

Communications between EPA and the Tribe, and groundwater sampling

On February 24, 2010, EPA sent a letter to Mr. Conrad requesting the submission of a written report describing the cleanup status of the Site within 45 days. Mr. Conrad's April 27, 2010 response letter stated in the first paragraph "I am writing to request that this leaking underground storage tank be recorded as closed." Mr. Conrad based his request on the likely degradation of residual hydrocarbons at the Site with the "passage of time," and the absence of complaints about hydrocarbon vapors at the Tribal agricultural well located approximately 550 feet west-northwest (hydraulically downgradient) of the Site.

On May 13, 2010, EPA sent a letter to Mr. Conrad requesting that the Tribe analyze groundwater samples from the nearby agricultural well for hydrocarbon compounds prior to EPA considering closure of the Site. EPA's letter requested a response from the Tribe within seven days. Following subsequent verbal and email communications between EPA and the Tribe, it was agreed that the U.S. Army Corps of Engineers, under contract with EPA, would collect and analyze groundwater samples from the agricultural well.

On March 30, 2012, a staff person from the U.S. Army Corps of Engineers collected groundwater samples from piping associated with the agricultural well. The analytical results for these samples showed no detections for volatile organic compounds (VOCs), total petroleum hydrocarbons as gasoline (TPH-gas), total lead and lead scavengers.

On February 4, 2014, Mr. Prokop sent an email to Ms. Robin Wilson, current TEPO Director, requesting Ms. Wilson's comments on the draft version of this NFA letter. On February 6, 2014, Mr. Christopher J. Nunez, Tribal Administrator, replied that the Tribe was "satisfied with EPA's actions and response."

Potential receptors and hydrocarbon exposures

The hydrocarbon concentrations in soil above EPA's residential RSLs that were obtained from the previously described sampling events at the Site were primarily found at 15 feet bgs, except for one sample at 10 feet bgs in boring SC1 (residential ethylbenzene RSL exceeded), and samples at 5 and 10 feet bgs in boring B1 (residential TPH RSLs exceeded). Based on EPA's telephone communication on January 8, 2013 with Sandy Johnson, Director of the CVTC, the Site is entirely paved and there have been no complaints of hydrocarbon vapors at the Site. Based on the depth of the residual hydrocarbon contamination and the complete paving of the Site, the likelihood of individuals at the Site being exposed to the residual hydrocarbon contamination through ingestion, inhalation or dermal contact is low. Furthermore, EPA believes these potential exposure pathways are not complete.

The depth to groundwater at the Site is unknown, but groundwater is believed to be shallow based on the historic recorded water levels in the agricultural well. As such, the potential exists for groundwater beneath the Site to be impacted by hydrocarbons. Based on EPA's discussions with Mr. Conrad and Barkley Root, former Tribal pesticide officer, the nearest Tribal drinking water well is located approximately ½ mile east-southeast of the Site. Mr. Conrad also indicated that groundwater is believed to flow from the Site to the northwest toward the Colorado River, located approximately ¾ mile from the Site. Given the ½ mile distance to the Tribal drinking water well and its apparent hydraulically upgradient location, the residual hydrocarbon contamination in soil at the Site should pose no threat to the Tribal drinking water well.

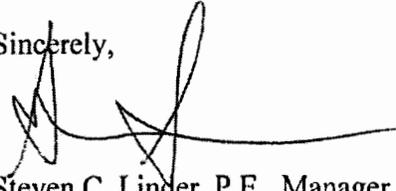
The nearest hydraulically downgradient receptor to the groundwater beneath the Site is the agricultural well, located approximately 550 feet west-northwest of the Site. As stated previously in this letter, however, the groundwater samples collected at the agricultural well on March 30, 2012 by the U.S. Army Corps of Engineers showed no detections for VOCs, TPH-gas, total lead or lead scavengers. Although the Colorado River is hydraulically downgradient of the Site, its ¾ mile separation from the Site makes the migration of hydrocarbons via groundwater over this distance unlikely.

Conclusion

For the reasons stated above, EPA does not believe that the residual hydrocarbon concentrations at the Site pose any threat to human health or the environment. This position is contingent, however, on the exposure assumptions for the Site remaining as they are at present. These exposure assumptions could change, for example, if the Tribe redeveloped the property in the future for some other purpose.

Therefore, if the land use at the Site changes and/or additional information becomes available in the future regarding hydrocarbon concentrations in soil and/or groundwater at the Site, EPA may reopen this site and require additional site assessment and/or corrective action. Please note that this NFA letter, as well as all supporting documentation, will be available to the general public for review upon request. EPA appreciates your assistance in this matter. If you have any questions regarding this letter, please contact me at (415) 972-3369.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Linder', with a long horizontal line extending to the right.

Steven C. Linder, P.E., Manager
Underground Storage Tanks Program Office

cc: Robin Wilson, TEPO Director, Cocopah Indian Tribe
Paul Soto, Planning Director, Cocopah Indian Tribe
Sandy Johnson, Director, CVTC