



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

November 1, 2017

DISTRIBUTED VIA EMAIL

Dennis Patch
Chairman
Colorado River Indian Tribes
26600 Mohave Road
Parker, Arizona 85344

Subject: No Further Action
Former D&D Farms Underground Storage Tank Cleanup Site
Mohave Road
Poston, Arizona 92225
(EPA ID No. CRIT047)

Dear Honorable Chairman Patch:

The U.S. Environmental Protection Agency (“EPA”) is sending this letter to inform you of our determination regarding the status of the former D&D underground storage tank (“UST”) cleanup site (“Site”), located in Poston, Arizona, on land of the Colorado River Indian Tribes. EPA contacted the Tribal leadership about this site in December 2013 and after consultation, EPA took the lead to conduct sampling activities at this location to discern if environmental contaminants of concern remained.

EPA collected several soil samples and one groundwater sample at the site in September 2017. Based on the sampling results, EPA has determined, in concert with the Colorado River Indian Tribe’s Environmental Protection Office (“CRIT EPO”), that no further action (“NFA”) is warranted for the Site, at this time. Specifically, this NFA determination is based on the following:

- Two USTs were removed in 1999;
- The Site is utilized as a farm equipment storage and maintenance yard;
- Drinking water is supplied to all CRIT residents via a public water supply systems; and
- Soil and groundwater sampling conducted by EPA in 2017 show none of the constituents of concern above EPA’s Regional Screening Levels.

Conclusion

Though shallow soil contamination was found in the area of the former fuel dispensers (See Enclosure C), this limited contamination poses no current threat to the public given the current land use as a farm equipment storage area. However, EPA recommends excavation of

the residual contamination in the soil around the former dispenser location if, in the future, the land is repurposed for residential use.

Given the information presented above, EPA recommends No Further Action. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at the Site, EPA may determine that additional site assessment and/or corrective action is warranted.

If you have any questions regarding the information contained in this letter, please contact Rebecca Jamison of my staff at (415) 972-3365, or you can contact me directly at (415)-972-3369.

Sincerely,

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

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

Cc (via email, all w/enclosures):
Wilfred J. Nabahe, CRIT EPO Dir.
Rebecca Loudbear, CRIT Attorney General
Herman "T.J." Laffoon, CRIT Commercial Mngr.

Enclosures:
A. Site Summary & Sampling Results
B. Site Layout

ENCLOSURE A

Site Summary

Former D&D Farms Underground Storage Tank Cleanup Site

Mohave Road

Poston, Arizona 92225

(EPA ID No. CRIT047GPS Coordinates: 33.993333, -114.399444)

Site Background and Former UST Operations

The Site is located 12 miles south of Parker, Arizona in the census-designated place of Poston, Arizona. The location is presently used as a farm equipment storage area for the Colorado River Indian Tribes' Farms. One modular home with a resident is on the site.

One 3,000 gallon and one 1,500 gallon UST were removed from the Site in late 1999 by ACT Environmental Technologies, Inc. ("ACT") with funding from the Bureau of Indian Affairs. The USTs were presumed to have been installed in the early 1940s and reportedly stored diesel and gasoline. Each UST had one product line that fed a dedicated dispenser. ACT's December 1999 report states that the system was taken out of service many years before the closure and that the dispensers had already been removed.

Site Assessment Work

CRIT EPO Work, 1999-2000

Soil samples collected at the time of the 1999 UST removal indicated a fuel release. According to ACT's report, the USTs were pitted and riddled with holes. Groundwater was not encountered during the removal; groundwater was estimated to be 10 to 25 feet below ground surface ("bgs"). Below are the soil sample results from ACT's 1999 report:

TABLE 1
SUMMARY OF SOIL SAMPLE ANALYSES
UST CLOSURE
D&D FARMS

SAMPLE # / DEPTH	METHOD 8021b				METHOD 8015AZR1			
	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENE (mg/kg)	C6-C10 GASOLINE (mg/kg)	C10-C22 DIESEL (mg/kg)	C22-C32 OIL (mg/kg)	C10-C32 TPH (mg/kg)
T1-N / 7' (tank)	37	310	140	950	11,000	4,500	<100	4,500
T1-S / 7' (tank)	240	1,100	390	3,000	36,000	13,000	<100	13,000
T2-N / 9' (tank)	1.5	23	12	73	1,000	340	<100	340
T2-S / 9' (tank)	16	110	44	430	8,000	3,000	<100	3,000
D-W / 2' (dispenser)	<0.25	<0.50	<0.50	33	1,400	2,200	<100	2,200
D-E / 2' (dispenser)	<0.50	<1.0	1.2	47	1,300	1,400	<100	1,400
D-EN / 2' (joint)	<0.05	0.25	<0.10	0.69	<20	31	<100	<130
AZ Res. SRL	0.62	1,500	790	2,800	-	-	-	4,100
AZ Non-Res. SRL	1.4	2,700	2,700	2,800	-	-	-	18,000

AZ Res. SRL - Arizona Residential Soil Remediation Levels
AZ Non-Res. SRL - Arizona Residential Soil Remediation Levels

Two additional soil samples were collected in by ACT on August 3, 2000 which confirmed benzene remained slightly above Arizona's groundwater protection levels ("GPLs") but other constituents of concern were below the GPLs. Soil sample results from ACT's April 2000 report:

ATTACHMENT II

**SUMMARY OF ANALYTICAL RESULTS
GEO-PROBE SAMPLING
D & D FARMS**

SAMPLE #/Depth	BENZENE	TOLUENE	E-BENZENE	XYLENE	TPH
DGP-1/12.5'	0.36	12	7.1	100	<130
DGP-2/8'	1.1	11	5.8	37	360
ARIZONA GPLs	0.71	400	120	2,200	NA

ARIZONA GPLs - Ground Water Protection levels. Maximum concentrations allowed in soil if ground water is within 30 feet.

NA - Not Applicable

EPA Federal-Lead with Trust Fund, 2017

In 2014, EPA agreed, after consultation with the Colorado River Indian Tribes' Tribal Council, to utilize federal LUST Trust Funds to investigate the status of petroleum contamination at the site. Federal funding became available in Fiscal Year 2017 to take samples and asses the current status of contamination at the site. Soil and one groundwater samples were collected on September 20-21, 2017. Shallow soil contamination near the historic dispenser island was observed but sampling results indicated the contamination did not exceed EPA's Regional Screening Levels for the contaminants of concern (benzene, toluene, ethylbenzene, xylene, Methyl tert-butyl ether (MTBE) and leaded scavengers). EPA soil borings went to 25' bgs and groundwater was encountered at 11' bgs.

Soil and groundwater sampling are presented on the next page.



TABLE 1: SUMMARY OF SOIL TEST BORING ANALYTICAL DATA

D&D FARMS SITE - CRIT #047
 Poston, La Paz County, Arizona
 USACE Contract No. W912P7-14-D-0001-00010
 liná bá, Inc. Project No. - USACE0217-6

Boring No.	Sample Depth (ft bgs)	Sample Date	Sample Time	PID (ppmV)	Benzene (µg/kg)	Toluene (µg/kg)	Ethylbenzene (µg/kg)	Xylenes (µg/kg)	MTBE (µg/kg)	Naphthalene (µg/kg)	1,2,4-Trimethylbenzene (µg/kg)	1,3,5-Trimethylbenzene (µg/kg)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	TPH-ORO (mg/kg)	Lead (mg/kg)	TEL (mg/kg)
SB-1	15.0 - 26.5	9/19/2017	10:17	1.5	<55	<110	<110	<330	<55	<270	<110	<110	<23	<25	<75	2.4	<0.0007
	25.0 - 26.5		10:37	0.5	<48	<96	<96	<290	<48	<240	<96	<96	<20	<25	<75	2.9	<0.0007
SB-2	10.0 - 11.5	9/19/2017	11:09	2.1	<53	<110	<110	<320	<53	64	160	<110	<22	<24	<73	3.5	<0.0007
	25.0 - 26.5		11:30	0.8	<51	<100	<100	<310	<51	<260	<100	<100	<21	<25	<74	2.3	<0.0007
SB-3	10.0 - 11.5	9/19/2017	11:58	0.6	<51	<100	<100	<310	<51	<260	<100	<100	<23	<25	<75	2.1	<0.0007
	25.0 - 26.5		12:10	0.2	<52	<100	<100	<310	<52	<260	<100	<100	<23	<24	<73	1.8	<0.0007
SB-4	10.0 - 11.5	9/19/2017	12:43	1.0	<54	<110	<110	<330	<54	<270	<110	<110	<23	<25	<75	2.2	<0.0007
	25.0 - 26.5		12:54	0.8	<54	<110	<110	<320	<54	<270	<110	<110	<23	<24	<73	2.3	<0.0007
SB-5	10.0 - 11.5	9/19/2017	13:29	0.7	<54	<110	<110	<320	<54	<270	<110	<110	<21	<24	<73	2.1	<0.0007
	25.0 - 26.5		13:50	0.4	<53	<110	<110	<320	<53	<260	<110	<110	<24	<25	<75	2.2	<0.0007
SB-6	10.0 - 11.5	9/19/2017	14:15	3.5	<59	<120	<120	<350	<59	<290	<120	<120	<25	41	93	4.4	<0.0007
	25.0 - 26.5		14:35	0.8	<51	<100	<100	<300	<51	<250	<100	<100	<23	<25	<74	2.2	<0.0007
SB-7	10.0 - 11.5	9/19/2017	14:53	1.4	<53	<110	<110	<320	<53	<270	<110	<110	<21	<25	<74	2.9	<0.0007
	25.0 - 26.5		15:09	1.0	<51	<100	<100	<300	<51	<250	<100	<100	<20	<25	<74	1.9	<0.0007
SB-8	10.0 - 11.5	9/20/2017	08:43	8.0	<57	<110	<110	<340	<57	<290	<110	<110	<23	<25	<74	1.9	<0.0007
	25.0 - 26.5		08:57	1.1	<58	<120	<120	<350	<58	<290	<120	<120	<21	<25	<75	1.9	<0.0007
SB-9	10.0 - 11.5	9/20/2017	09:19	1.5	<55	<110	<110	<330	<55	<280	<110	<110	<23	<25	<75	2.7	<0.0007
	25.0 - 26.5		09:35	0.7	<56	<110	<110	<340	<56	<280	<110	<110	<25	<25	<74	2.0	<0.0007
SB-10	5.0 - 6.5	9/20/2017	09:54	10.6	<50	<99	<99	<300	<50	<250	<99	<99	<20	53	<74	2.6	<0.0007
	25.0 - 26.5		10:13	3.2	<50	<100	<100	<300	<50	<250	<100	<100	<20	<24	<73	3.3	<0.0007
Arizona DEQ Tier 1 Cleanup Standards ¹					620	790,000	1,500,000	2,800,000	320,000	2,600	NE	NE	4,100	4,100	4,100	400	NE
USEPA Region 9 Regional Screening Levels					13,000	6,300,000 ²	63,000	16,000,000 ²	390,000	3,800	780,000	2,300,000	82	110	2,500	400	0.00078

D&D FARM SITE - CRIT #047
 Poston, La Paz County, Arizona
 USACE Contract No. W912P7-14-D-0001-00010
 liná bá, Inc. Project No. - USACE0217-6

Boring No.	Boring Depth (ft bgs)	Sample Date	Sample Time	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Total Xylenes (µg/L)	Methyl tertiary-butyl ether (µg/L)	Naphthalene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	1,3,5-Trimethylbenzene (µg/L)	TPH-GRO (mg/L)	TPH-DRO (mg/L)	Lead (mg/L)	TEL (µg/L)
SB-1	25	9/19/2017	10:45	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	<0.10	0.21	<0.053
SB-2	25	9/19/2017	11:45	6.1	47	640	3,300	<1.0	40	890	200	13	2.6	<0.15	<0.053
SB-3	25	9/19/2017	12:25	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	<0.10	<0.15	<0.053
SB-4	25	9/19/2017	13:20	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	<0.10	<0.15	<0.053
SB-5	25	9/19/2017	14:15	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	<0.10	<0.15	<0.053
SB-6	25	9/19/2017	14:50	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	0.27	<0.015	<0.053
SB-7	25	9/19/2017	15:30	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	0.26	<0.015	<0.053
SB-8	25	9/20/2017	09:15	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	<0.10	<0.015	<0.053
SB-9	25	9/20/2017	09:45	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	0.33	<0.015	<0.053
SB-10	25	9/20/2017	10:30	<2.0	<2.0	<2.0	<10.0	<1.0	<5.0	<2.0	<2.0	<0.20	2.0	<0.015	<0.053
ADEQ Tier 1 Clean-Up Standards				5.0	1,000	700	10,000	20	6.5	12	12	NE	NE	NE	NE
USEPA Region 9 Regional Screening Levels (MCLs)				5.0	1,000	700	10,000	14 ³	0.17 ⁴	15 ³	120 ⁴	0.033 ⁴	0.800 ⁴	0.015	0.13

Risk Receptors

The location remains an industrial location for farm equipment storage. The site is fenced off and public ingress is restricted. No drinking wells or surface water locations are located near the site. No structures are located above the residual contamination for vapor intrusion concerns. Therefore, there are no complete pathways to receptors for the residual remaining contamination.

ENCLOSURE B
 (EPA ID No. CRIT047)
 2000 ACT ENVIRONMENTAL TECHNOLOGIES, INC.
 1999 and 2000 sampling locations are indicated

ATTACHMENT I

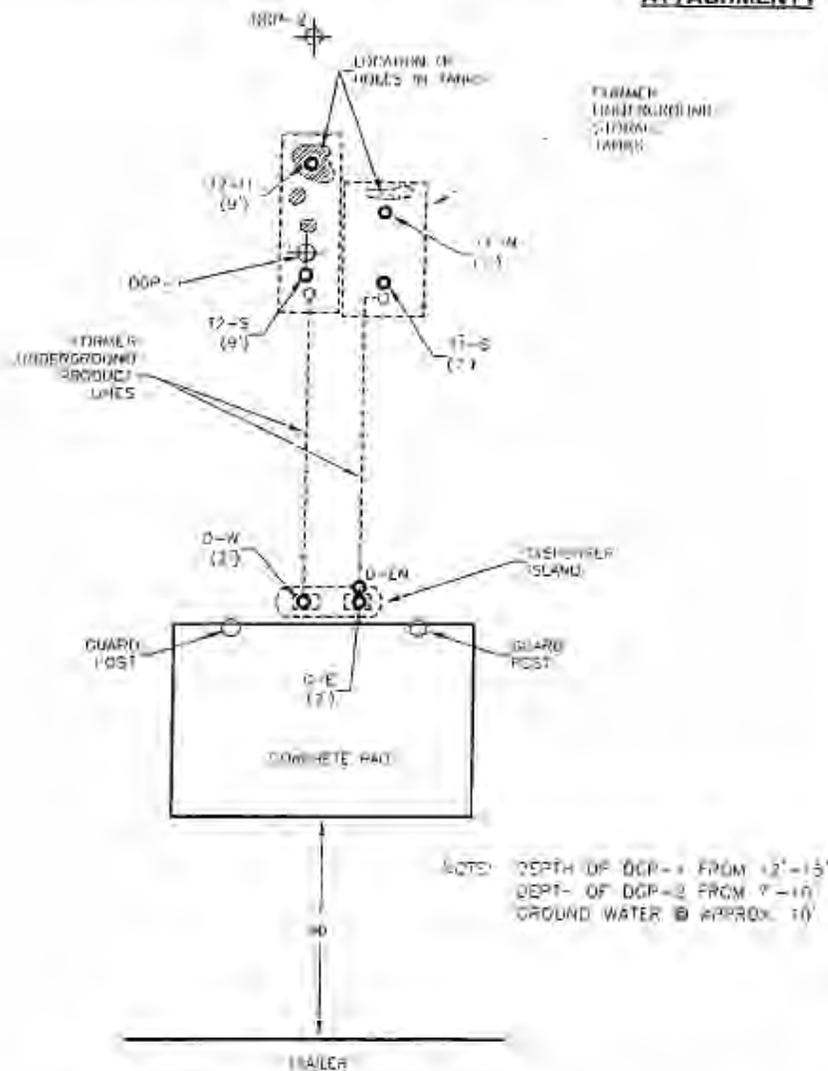
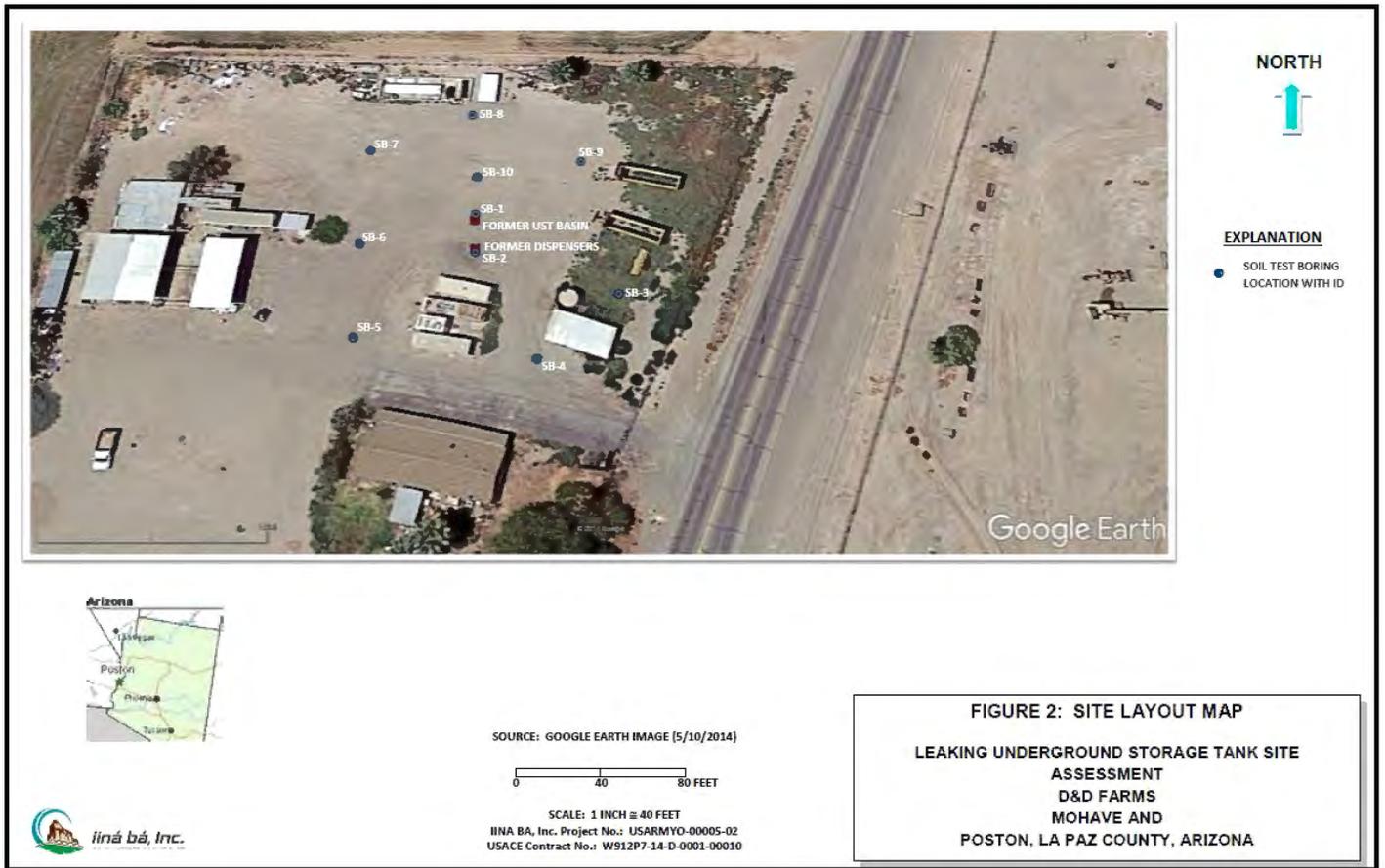


FIGURE 2
 SAMPLE LOCATION MAP
 D&O FARMS
 CRIT RESERVATION

PROJECT NO. 99-049D	PREP. BY AEM	
DATE 01/23/01	REVIEW BY JLR	

2017 MAP OF EPA'S SAMPLING LOCATIONS



From: Wilfred Nabahe
To: [Jamison, Rebecca](#)
Subject: RE: REVIEW by Nov 2ne? ___ D & D FW: LUST Assessment Report - D&D Farms (CRIT #047)
Date: Friday, October 20, 2017 12:44:11 PM
Attachments: [image001.png](#)
[CRIT047 No Further Action WJN Edits.doc](#)

Rebecca:

Attached is my recommendation or additions highlighted in yellow. For the recommendations section, I merely expanded to “capture” what I thought it was suggesting, because the original didn’t have clarity.

For the draft Assessment Report, other than page 4 & page 8 (correct to “States”) at the top paragraph, I didn’t see anything out of order.

I would concur with EPA’s determination.

Thanks and let me know if you have any additional questions.

w.

From: Jamison, Rebecca [mailto:Jamison.Rebecca@epa.gov]
Sent: Thursday, October 12, 2017 1:37 PM
To: Wilfred Nabahe <Wilfred.Nabahe@crit-nsn.gov>
Cc: jisham@iinaba.com; Linder, Steven <Linder.Steven@epa.gov>; Cooper, Destinee <COOPER.DESTINEE@EPA.GOV>
Subject: REVIEW by Nov 2ne? ___ D & D FW: LUST Assessment Report - D&D Farms (CRIT #047)
Importance: High

Wilfred,

Attached is the draft report from iina’ba’ for the work conducted at the former D&D farms location. Localized soil contamination was found, below EPA regulatory standards, around the old dispenser islands locations.

Also attached is EPA’s proposed draft letter proposing No Further Action on the site. Would it be possible to review and provide comments (and/or concurrence/non-concurrence) by November 2nd?

Thank you
Rebecca

From: John Isham [mailto:jisham@iinaba.com]
Sent: Tuesday, October 10, 2017 9:44 AM
To: Jamison, Rebecca <Jamison.Rebecca@epa.gov>; daniel mcmindes

<Daniel.C.McMindes@usace.army.mil>

Cc: Duane Aspaas <daspaas@iinaba.com>; Edwina Aspaas <edwina.aspaas@iinaba.com>; Cory LeClaire <cleclaire@iinaba.com>; Suzanna Tsosie <stsosie@iinaba.com>

Subject: LUST Assessment Report - D&D Farms (CRIT #047)

Importance: High

Attached is draft report for D&D Farms.

Regards,



iiná bá, Inc.

John R. Isham

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