



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

May 3, 2019

Timothy Williams  
Chairman  
Fort Mohave Tribe of Arizona, California & Nevada  
500 Merriman Avenue  
Needles, CA 92363  
Email: TimothyWilliams@fortmojave.com

Subject: No Further Action  
Fort Mojave Smoke Shop Leaking Underground Storage Tank (LUST) Site  
Ft. Defiance, Arizona (EPA ID# FTMO005)

Dear Chairman Williams:

The U.S. Environmental Protection Agency (EPA) has completed its review of documents pertaining to the Fort Mojave Smoke Shop leaking underground storage tank (LUST) cleanup site. EPA has determined that no further action (NFA) is necessary for the Site based on the findings from the last three quarters of groundwater monitoring in conjunction with active remediation of the 2013 release at the Site. Specifically, this NFA determination is based on the following:

- The older UST systems was replaced in 2013;
- 60 cu yards of contaminated soil were removed from the site in 2013;
- Remediation of impacted groundwater has resulted in three quarters of non-detect for all concentrations of concern;
- Groundwater at or near the site is not used for human consumption or agricultural purposes; and
- The Site continues operation as a gasoline retail facility.

Based on the information cited above, EPA has determined that No Further Action is necessary at this time. 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 C. Linder".

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

cc: Christine Medley, Environmental Director  
Bryan Bowker, BIA-Western Region [bryan.bowker@bia.gov](mailto:bryan.bowker@bia.gov)

---

*Enclosure A*

---

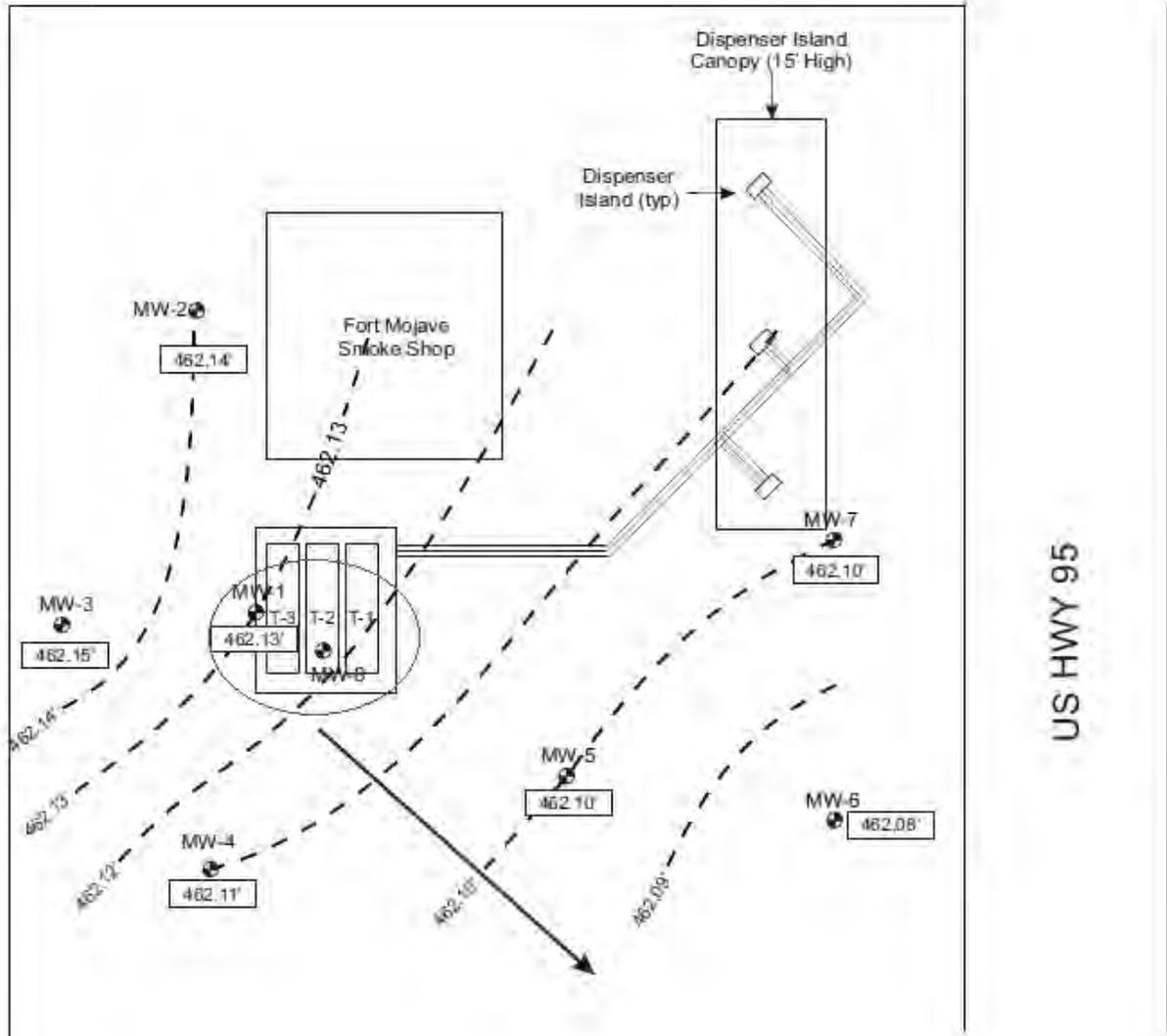
**FTMO005- Ft. Mohave Smoke Station Former Amoco-Ft Defiance, 8501 HWY 95, Fort Mohave, AZ, Mohave**

Former Amoco-Ft Defiance is located on Kit Carson Drive in Ft Defiance  
Latitude 34.9090556, Longitude -114.5982583

**Figure 1: Location of old USTs**



**Figure 2: Monitoring Well Locations**



## **Background**

The Ft Mojave Smoke Shop observed a loss of approximately 200 gallons of petroleum at the Site on August 1, 2013 after a failed pressure test. An immediate review by Ft Mohave Environmental Office led to the product being moved from UST #T-3, the origin of the release. UST #T-3 was then temporarily closed on August 9, 2013. Three 10,000-gallon USTs installed in 1989 were permanently closed by removal on October 30, 2013. Three new USTs were installed northeast of the original UST location.

During removal of the old UST system in 2013, pitting and holes were observed in UST T-3. The other two USTs (T-1 and T-2) were intact. 60 cubic yards of stained soil was excavated from the tank pit. Groundwater was encountered at 17' below ground surface (bgs). Soil samples were collected from the southernmost product dispenser and in the UST pit. Five groundwater monitoring wells were installed, and samples collected from all but MW-1 which had free product. Two additional monitoring wells, MW-6 and MW-7, were installed in December 2013.

A skimmer was initially placed on MW-1 to recover product in the well, after recovering 10 gallons of product, the skimmer was removed. An absorbent sock was placed in MW-1 in mid-December 2013. Free product was later observed on January 24, 2017 in MW-8. Free product recovery via hand bailing was initiated on MW-8. A free product skimmer was put on the well in February and remained for nearly one year recovering 12.65 gallons of product. Hydrophobic absorbent socks were then placed in the well but no free product has been observed since June 2018 and the most recent groundwater monitoring results show all COCs below remediation goal level since May 2018(See Figure 2). Both of the wells which had at times free product, were situated in the old UST tank pit.

All other monitoring wells have been below EPA's remedial goals since March 2016.

## **Current Status**

Groundwater monitoring of the site recorded reductions in constituents of concern over the last five years. However, one area near MW-1 and MW-8 in the source location, required a more aggressive remedial approach. Remediation with a soil vapor extraction (SVE) and air sparging (AS) system was started in August 2018. It operated as anticipated until October 22, 2018. The system ran for 271 hours and removed 3,640 lbs of VOCs from the subsurface. Rebound was not observed in any monitoring wells.

MW-1 achieved the benzene remedial goal in May 2018 and MW-8 achieved the benzene remedial goal in August 2018. Three subsequent monitoring events have confirmed now all constituents of concern are all below regional screening levels<sup>1</sup>. The site remains an active gas station/convenience store.

---

<sup>1</sup> <https://www.epa.gov/risk/regional-screening-levels-rsls>

---

*No Further Action*

---

Groundwater beneath the site is not presently utilized for human consumption or agricultural purposes. The nearest public water supply wells are over four miles from the Site. There is no ingestion or inhalation exposure pathways.

Based the reports submitted, including the April 11, 2019 First Quarter Periodic Site Status Report from EnTech, Inc. the remediation has achieved the required remedial goals and can be discontinued. No Further Action is required.