UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
Underground Storage Tanks Program Office
(LND-4-3)

JAN 18 2017

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RETURN RECEIPT REQUESTED

Mr. Perry Honani
PO Box 440
Second Mesa, Arizona
86043

Subject: Conditional No Further Action with Institutional Control and Five-Year Review
Honani's Auto Repair and Towing Underground Storage Tank Cleanup Site
Second Mesa, Arizona
(EPA ID No. HOPI017)

Dear Mr. Honani:

The U.S. Environmental Protection Agency ("EPA") is sending this letter to inform you of our determination regarding the status of the Honani's Auto Repair and Towing underground storage tank ("UST") cleanup site ("Site"), located in Second Mesa, Arizona, on land of the Hopi Tribe ("Tribe"). EPA has determined, in concert with the Hopi Environmental Protection Office and the Hopi Water Resources Program, that no further action ("NFA") is warranted for the Site, at this time, based on the findings of the site assessment in 1999. Specifically, this NFA determination is based on the following:

- The remaining residual hydrocarbon contamination in the soil is localized around the former location of the USTs and is not expected to mobilize without significant changes in the environment. It is ten feet below ground surface ("bgs").
- Groundwater was not encountered when the USTs were removed in 2005; soil borings went down as far as 45' (bgs).
- Any groundwater beneath the Site is significantly deeper than the residual contamination, and we do not believe the current levels pose a threat to the supply.
- Current land use as an Auto Repair business is unchanged.
- Petroleum vapor intrusion into nearby buildings is unlikely due to the location of the business in relation the contamination source. No residences are located on the property.
- The nearest drinking water supply well is tested for VOCs triennially and has not detected contamination from this site.
- The remaining relatively deep contamination at the Site would not impede future use or development.

EPA's Five-Year Review and Potential Recommendation for Sampling by the HEPO

Within five years of this NFA determination, EPA intends to evaluate any new information pertaining to the Site and surrounding areas, which may include: new analytical data for soil and/or groundwater, precipitation data, pumping rates for drinking water and/or agricultural wells, proposed new development plans, any renewed use of currently inactive drinking water wells, verbal communications with the Hopi Tribe or any other appropriate data.

One potential outcome of EPA's five-year review would be a recommendation for groundwater sampling. This could potentially occur if precipitation rates increased significantly, the water table rose, and additional hydrocarbons were mobilized as free product and/or as dissolved phase into groundwater. This situation would potentially warrant a reassessment of the assumption that the hydrocarbon plume is stable by collecting and analyzing groundwater samples from all of the monitoring wells at the Site.

Recommendations if Land Use Changes

While low levels of contamination were present at the last sampling event in 1999, the NFA is only recommended with the current land use in consideration. It is EPA's recommendation that if land use changes, a geophysical survey should be conducted to assess the location of a third tank which was reported to be closed in place before 1998 as well as any associated piping which may have been left behind.

Conclusion

Due to the current land use of this site as an automotive repair shop, the low levels of contamination present in the soil in 2010, and the low risk for groundwater contamination, 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 Lyndsey Tu of my staff at tu.lyndsey@epa.gov and (415) 972-3269, or you can contact me directly at linder.steven@epa.gov and (415)-972-3369.

Sincerely,

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

Cc (via email, all w/enclosures):

Herman G. Honanie, Chairman
Alfred Lomahquahu, Vice Chairman
Wendell Honanie, BIA Superintendent, Hopi Agency
Gail Honanie, Hopi EPO

Enclosures: A. Site Chronology and Investigation
B. Sampling Results
C. Site Layout

U.S.

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ENCLOSURE A
HONANIS AUTO REPAIR AND TOWING
Second Mesa, Arizona (EPA ID No. HOPI-017)
Chronology of Site Investigation and Remediation

Site Background and Former UST Operations

The Site is located on an open lot in Second Mesa, Arizona, which has a population of approximately 800. The Second Mesa Day School is located 500ft from the site, and there is a residence that is also approximately 500ft from the site. The Honani family operated the former Texaco store and two 4,000-gallon USTs were used for storing and dispensing gasoline. The facility as an active gas station named PWH Automotive Repair and Towing until December of 1998 when the tanks were put into temporary closure.

In January of 2000 the business name was changed to Honanis Auto Repair and Towing and it remains in operation under that name presently. The tanks remained in temporary closure until 2005 when they were removed.

Site Assessment and Remediation Work from 1998 to 2010

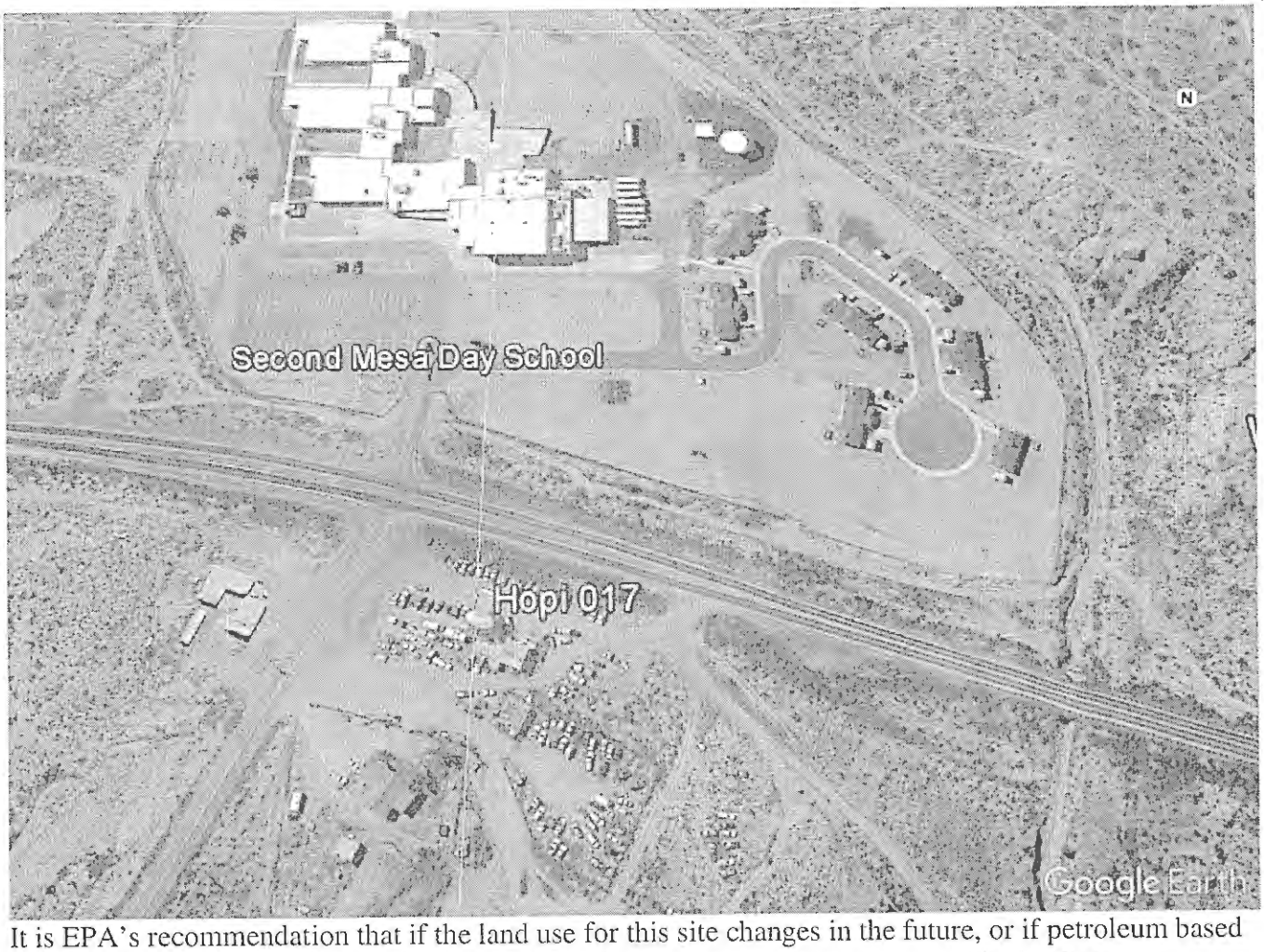
2005 UST Removal and 2010 Site Assessment by the HEPO

Two 4,000 gallon tanks were in temporary closure from 1998 until 2005. In March 2005, HEPO in coordination with the Abandoned Mine Land ("AML") contractors and Western Technologies (WT) removed two 4,000 gallon UST's, as well as their dispensers and piping. Soil sampling in July of 2010 showed a maximum Diesel Range Organics ("DRO") concentration of 4,700 milligrams per kilogram ("mg/kg") and Gasoline Range Organics ("GRO") at 1,600 mg/kg. Of the other constituents in the analysis, only Ethylbenzene exceeded the EPA Residential Regional Screen Levels ("RSL") at a maximum of 24 mg/kg.

Discussion of Potential Receptors

Second Mesa Day School is located within 500 feet of the site, however soil contamination is not believed be a threat to the school building due to distance between the two locations and the low concentrations. Residual hydrocarbon contamination in soil at the Site represents an incomplete exposure pathway for the direct contact and inhalation exposure routes if construction were to occur at the Site.

In addition, the Second Mesa Day School draws their drinking water from 1,000 feet and deeper below ground surface ("bgs"). Moreover, water samples collected from the well in November 2015 showed no detections for constituents of concern.



It is EPA's recommendation that if the land use for this site changes in the future, or if petroleum based contamination is found in the nearby well, at any level above drinking water standards; that a site assessment be conducted to determine if contamination is still present and its extent. Due to the current use of the site EPA

ENCLOSURE B
HONANIS AUTO REPAIR AND TOWING
Second Mesa, Arizona (EPA ID No. HOPI-017)
Sampling Results

Hopi-017
July 2010

Table 1 EPA LS26 PHWTex for CAD

Sample ID	Depth	PID	DRO	ORO	GRO	Benzene	Ethylbenzene	Toluene	Xylenes, total
		Method:	8015B	8015B	SW8015B	SW8260B	SW8260B	SW8260B	SW8260B
		Units:	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
		EPA RSL*	83	NE	83	1.1	5.4	5000	600
B1-5	5	0	ND (25)	ND (75)	ND (23)	ND (0.059)	ND (0.059)	ND (0.059)	ND (0.179)
B1-15	15	5	ND (25)	ND (75)	ND (26)	ND (0.058)	0.069	0.17	0.71
B1-20	20	42	ND (25)	ND (75)	ND (25)	ND (0.068)	0.11	0.93	0.21
B1-25	25	253	ND (25)	ND (75)	ND (24)	ND (0.057)	ND (0.057)	0.1	0.237
B1-45	45	143	ND (25)	ND (75)	ND (20)	0.33	0.14	1.3	0.84
B2-25	25	0	ND (25)	ND (75)	ND (23)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.180)
B2-30	30	0	ND (25)	ND (75)	ND (24)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.180)
B3-10	10	283	1,200	ND (380)	1,300	0.27	23	28	169
B3-12†	10	283	4,700	410	1,600	0.2	24	27	188
B3-45	45	250	ND (25)	ND (75)	ND (24)	0.25	0.15	0.97	0.96

Notes:
The analytical laboratory was Test America in Phoenix, Arizona.
All depths in feet below ground surface.
*Based on groundwater as a current or potential source of drinking water from *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater* (May 2006), California Regional Water Quality Board, San Francisco Bay Regional Water Quality Control Board, California EPA Website: http://www.waterboards.ca.gov/sanfranciscobay/esl.shtml.
†EPA Region 9 RSL Table (May 2010)
" = indicates duplicate sample

DRO = diesel range organics
EPA = U.S. Environmental Protection Agency
GRO = gasoline range organics
ID = sample identification
mg/kg = milligrams per kilogram
ND = not detected at concentrations exceeding the PQL (shown in parentheses)
NE = not established
ORO = oil range organics
PID = photoionization detector
PQL = practical quantitation limit
RSL = Regional screening level
SW = EPA Solid Waste Method
HEPO = Hopi Environmental Protection Office

ENCLOSURE C
HONANIS AUTO REPAIR AND TOWING
Second Mesa, Arizona (EPA ID No. HOPI-017)
Site Map (from 2010 Tank Removal)