



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street
San Francisco, CA 94105-3901

June 3, 2019

Robert Moss
Thriftway Marketing Corp.
501 Airport Drive Suite 100
Farmington, NM 87401-2646

RE: *No Further Action*
Former Thriftway #225 (NAV-128)
BIA Route N12, Fort Defiance, Arizona
Site ID: NAV-128

Dear Bob,

The United States Environmental Protection Agency (EPA), Region 9 has completed our review of the reports related to the former Thriftway #225 leaking underground storage tank (LUST) cleanup site (Site). The BioTech May 8, 2019, Semi-Annual Monitoring and Sampling Report requested Site Closure and No Further Action. EPA has determined, with concurrence from the Navajo Nation Environmental Protection Agency (NNEPA), that no further action (NFA) is necessary for the Site. A summary of the site history is provided in Enclosure B. The NFA determination is based on the following:

- No residual contamination was above federal or tribal standards was identified in the May 8, 2019 groundwater samples;
- Dual Phase Extraction remediation was operated at the site between December 2008 and September 2012, reducing BTEX and MTBE by 99%;
- ORC Advance was injected at 5 locations to achieve NNEPA's MTBE groundwater objective; and
- The closest municipal well is over ½ mile west of the site.

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 Pam Maples of the NNEPA at 928-971-7764 or me at 415-972-3369 or linder.steven@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Linder".

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

Sent via email

Cc: O. Whaley, NNEPA
D. Malone/P. Maples, NNEPA
R. Kennemer, BioTech Remediation
Libby Valtreau, Ft. Defiance Rural Business Development Office
Bart Stevens, BIA-Navajo Region Bartholomew.Stevens@bia.gov

Enclosure A

Former Thriftway #225 (NAV-128)
BIA Route N12, Fort Defiance, Arizona

Latitude: 35.733611, Longitude: - 109.058611



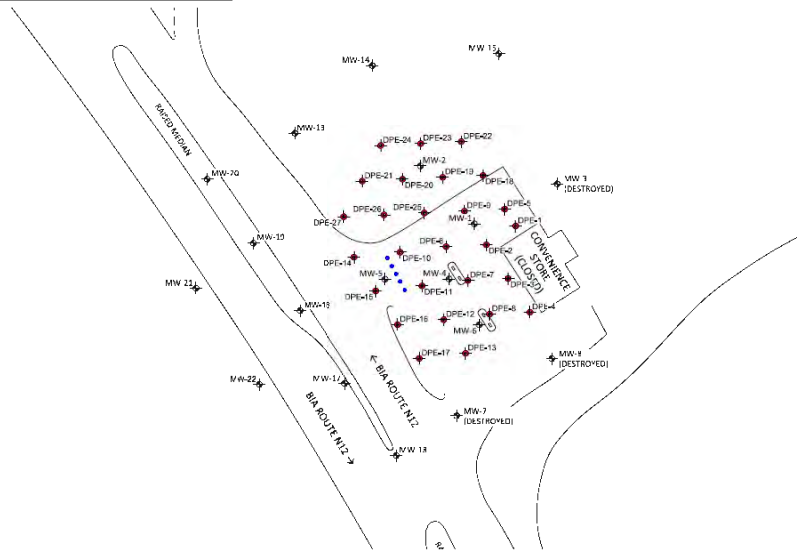
Background

The former Thriftway #225 was operated as a gas station and convenience store for more than 20 years. The facility was built and operated by Thriftway from its time of construction in the early 1980s, up to 2001 when it was acquired by Giant Industries, Inc. (Giant), which, after a series of mergers and acquisitions is presently owned by Marathon Petroleum Corporation.

2002 UST Removal, Site Assessment and Remediation

In June 2002, Giant removed the entire fueling system, except for the product piping and the dispenser islands. In September 2015, Western Refining, a successor to Giant, demolished the building, removed the dispenser islands and remaining product pipe, and most of the asphalt

and concrete surfacing.¹ Between December 2008 and September 2012, a dual-phase extraction (DPE) remediation system was operated at the site, which resulted in a 99.9% decrease in BTEX and MtBE concentrations across the site. BioTech personnel completed ORC Advance™ injections into five direct push-points, immediately up-gradient from monitor well MW-5, on September 23 and 24, 2014. A total of 65 gallons of ORC Advance™ was injected into the five push-points.



Groundwater monitoring was conducted semi-annually at the site to monitor the reduction of BTEX and MtBE. BTEX readings achieved cleanup goals in all but three wells in 2012 and MtBE in four wells. Additional remediation work was undertaken in MW-1, MW-16, MW-17 and MW-21. Remedial goals for all constituents of concern were achieved in November 2018. Subsequent monitoring in April 2019 confirmed the readings.

Current Status

The site is currently a vacant lot along Highway 12. A residential area is west approximately 180 feet of the site.

¹ Semi-Annual Monitoring and Sampling Report and Request for Site Closure and No Further Action Determination, Former Thriftway #225 (NAV-128), BioTech, May 8, 2019

No Further Action

Based the reports submitted, including the May 8, 2019 Semi-Annual Monitoring and Sampling Report and Request for Site Closure, EPA agrees that No Further Action is required.