



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105



January 12, 2011

Ms. Diane Malone
Environmental Department Director
Waste Regulatory and Compliance Department
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

Re: No Further Action (NFA) for the Former Copper Mine Trading Post (NAV-183), Copper Mine, AZ

Dear Ms. Malone:

The U.S. Environmental Protection Agency (EPA) has completed the review of the report entitled "Underground Storage Tank Closure Report Former Copper Mine Trading Post (NAV-183), Copper Mine, AZ," dated November 2010. The report describes the site closure activities conducted at the site where the possible existence of two underground storage tanks (USTs) was suspected. The LUST program of the Navajo Nation Environmental Protection Agency (NNEPA) oversaw the excavation activities and sample collection. The work was funded with the NNEPA FY 2010 LUST Trust Grant.

Site Background

The Copper Mine Trading Post was started by Coat Patterson in 1955 and he operated the Trading Post until 1972. Thell and Anna Jean Black purchased the Trading Post in 1979 and submitted an EPA Notification Form (7530-1) in 1986, stating that there were two bare steel tanks at the site but provided no further information other than the site was located on leased land. This was confirmed by the Bureau of Indian Affairs (BIA) Realty Office in Tuba City which stated that the site was on private land and therefore BIA had no lease information. The site of the Trading Post may have been located on Bureau of Land Management (BLM) land leased to the Coconino Copper and Chemical Co. which extracted copper minerals in the area until 1968. The Mesa Mining Co is currently negotiating a lease with the Navajo Nation to explore the area for additional copper resources (from Internet research). No information on the final closure of the Trading Post has been found.

In 2000, EPA Region 9 staff visited this site and found evidence of fueling operations including old dispensers and stained soil although there was no intact UST system in place. The EPA staff went back to the site in 2004 and clearly found petroleum contaminated soil in the site. He recommended a geophysical survey to determine if USTs were present at the site.

Site Assessment

Exploratory excavation combined with soil screening and sampling were initiated on September 27, 2010. No USTs were encountered at the suspected location. The excavation was backfilled and compacted the same day. Analytical results of samples collected in the excavation floor indicated detection of total petroleum hydrocarbons (TPH) at 13.3 parts per million and total lead at 26.8 ppm, but below the NNEPA and EPA action levels of 500 ppm and 400 ppm, respectively.

Recommendations

EPA Region IX has discussed and reviewed the report findings with Mr. Henry Haven of the NNEPA and after several discussions Mr. Haven has recommended that this site be closed without additional action. EPA concurs with the NNEPA recommendation. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site, EPA or the NNEPA may reopen this site and require additional site assessment and/or corrective action.

If you have questions regarding the information contained in this letter, please contact Walter Guggenheimer of my staff at 415-972-3377 or Henry Haven of the NNEPA at 928-871-7997.

Sincerely,



Carl Warren, Supervisor
Tribal Leaking UST Program
Underground Storage Tanks Program Office

Cc: Henry Haven, NNEPA
Warren Roan, NNEPA
Mimi Newton, USEPA
Site File NAV-183